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The Administrative Record Staff



# Closeout Report for the Source Removal at the Trench 1 Site IHSS 108

RF/RMRS-99-302.UN



ADMIN RECCRD

June 1999  
Revision 0

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1/164

## ADMINISTRATIVE INFORMATION


Site: Rocky Flats Environmental Technology Site (RFETS), Golden, Colorado

Project Name: Source Removal at Trench 1 - IHSS 108

Date Prepared: June 29, 1999

### Approvals

I have read and approved this Closeout Report with respect to the regulatory requirements and objectives of the project.



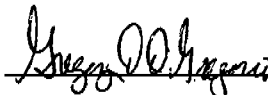
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Note: Classification review has been waived in accordance with exemption number CEX-010-98

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## ACRONYMS

|        |   |
|--------|---|
| CDPHE  | Colorado Department of Public Health and Environment                |
| CERCLA | Comprehensive Environmental Response Compensation and Liability Act |
| CFR    | Code of Federal Regulations   |
| CPM    | Counts Per Minute   |
| CWTF   | Consolidated Water Treatment Facility                               |
| DER    | Duplicate Error ratio   |
| DQA    | Data Quality Assessment   |
| DQO(s) | Data Quality Objective(s)   |
| DU     | Depleted Uranium  |
| EPA    | Environmental Protection Agency                                     |
| EPI    | Environmental Physics Inc.  |
| FIDLER | Field Instrument for the Detection of Low Energy Radiation          |
| HEPA   | High Efficiency Particulate Air                                     |

|                 |  |
|-----------------|--|
| IDM             | Investigation Derived Materials  |
| IHSS            | Individual Hazardous Substance Site                                      |
| LCS             | Laboratory Control Sample(s)   |
| LDR(s)          | Land Disposal Restrictions   |
| LLW             | Low-Level Waste  |
| MDA             | Minimum Detectable Activity  |
| MLLW            | Mixed Low-Level Waste  |
| MS              | Matrix Spike   |
| PAM             | Proposed Action Memorandum   |
| PARCC           | Precision, Accuracy, Representativeness, Completeness, and Comparability |
| PCB(s)          | Polychlorinated Byphenyl(s)  |
| PCE             | Tetrachloroethene  |
| PE              | Performance Evaluation   |
| PPE             | Personal Protective Equipment  |
| RAAMP           | Radioactive Ambient Air Monitoring Program                               |
| RCT(s)          | Radiological Control Technicians   |
| RCRA            | Resource Conservation and Recovery Act                                   |
| RFCA            | Rocky Flats Cleanup Agreement  |
| RFETS           | Rocky Flats Environmental Technology Site                                |
| RMRS            | Rocky Mountain Remediation Services, L.L.C.                              |
| RPD             | Relative Percent Difference  |
| SAP             | Sampling and Analysis Plan   |
| SIP             | Sampling and Inerting Pad  |
| SVOC            | Semivolatile Organic Compounds   |
| T-1             | Trench 1   |
| TCE             | Trichloroethene  |
| TCLP            | Toxicity Characteristic Leaching Procedure                               |
| TNU             | Thermo NuTech  |
| TSCA            | Toxic Substances Control Act   |
| TU              | Temporary Unit   |
| UCL             | Upper confidence Limit   |
| UHC(s)          | Underlying Hazardous Constituent(s)                                      |
| VOC(s)          | Volatile Organic Compound(s)   |
| WAC             | Waste Acceptance Criteria  |
| WEMS            | Waste Environmental Management System                                    |
| yd <sup>3</sup> | Cubic Yard   |

## 1.0 INTRODUCTION

This closeout report was prepared to document the results of the excavation phase of a source removal conducted at the Trench 1 (T-1) site which is located at the Rocky Flats Environmental Technology Site (RFETS). T-1 is also known as Individual Hazardous Substance Site (IHSS) 108. The excavation phase of the source removal was completed in August, 1998. This report also includes a summary of the site reclamation activities which included return of Investigation Derived Materials (IDM) from previous site characterization activities at RFETS.

### 1.1 Historical Background

The T-1 site was located northwest of the inner east gate, about 40 feet south of the southeast corner of the Protected Area fence (Figure 1-1). The trench was expected to be 200 feet long, 15 to 20 feet wide, and 10 feet deep. Historical documentation indicated that depleted uranium (DU) metal chips (lathe and machine turnings) originating from Building 444 were packed with lathe coolant and buried in the west end and possibly the east end of T-1 in approximately 125 drums. Ten drums of cemented cyanide and one drum of "still bottoms" (recovered waste solvents or evaporated lathe coolant sludge) were also suspected to have been buried in T-1 along with an unknown amount of debris.

Drums disposed in the trench were reportedly double stacked end-on-end and covered with one to two feet of soil. No written documentation existed for the contents of the center and east end of the trench. However, interviews with former site workers indicated that the eastern two-thirds of the trench was likely to contain trash consisting of pallets, paper, and other debris such as empty or crushed drums. Summaries of the interviews are contained in the project files. Burial operations in the trench continued intermittently from November 1954 to December 1962.

Weed cutting activities conducted in October and November 1982 unearthed the upper portion of two drums not adequately covered with fill material. Samples of the liquids and sludges contained in these drums were collected for radiochemical analyses and yielded low levels of plutonium, and uranium activities that could have been indicative of enrichment.

Since discovery of the drums, site investigations were conducted to evaluate the suspected area of impact and the potential contaminants. These investigations included additional soil and groundwater samples at locations surrounding the trench area, a soil gas survey, an electromagnetic and ground penetrating radar survey, a review of historical aerial photographs,

employee interviews, and a detailed records search. Based on a review of the data, impacts of the T-1 contaminants were considered to be primarily confined to the soil within the trench boundaries. Additional information regarding site background, previous investigative data, suspected radiological and chemical impacts, geology and hydrogeology are documented in the reports listed below:

- Historical Release Report for the Rocky Flats Plant (DOE, 1992);
- Phase II RFI/RI Report for Operable Unit No. 2 - 903 Pad, Mound, and East Trenches Area, Rocky Flats Environmental Technology Site (DOE, 1995a);
- Draft Trenches and Mound Site Characterization Report, (RMRS, 1996b);
- Proposed Action Memorandum for the Source Removal at Trench 1, IHSS 108 (RMRS, 1998a).

## 1.2 Project Summary

This source removal was conducted in accordance with the Proposed Action Memorandum (PAM) for the Source Removal at Trench 1, IHSS 108 (RMRS, 1998a). This source removal was conducted by Rocky Mountain Remediation Services, L.L.C. (RMRS) on behalf of Kaiser-Hill Company, L.L.C., for the U.S. Department of Energy (DOE)/Rocky Flats Field Office.

Prior to excavation, a large freestanding temporary structure was erected over the trench. This structure allowed all excavation, initial processing of the excavated wastes (e.g. inerting) and stockpiling of soil and containerized waste to take place within an enclosed weather structure. Following construction of the weather structure, the project team went through a series of drills and a detailed readiness assessment. Excavation activities began on June 10, 1998 after successful completion of the readiness assessment. Supporting documents used by RMRS to complete the project are included in the project files. Following excavation, the Environmental Protection Agency (EPA) granted DOE approval to place Investigation Derived Materials (IDM), in this case soil cuttings resulting from previous RFETS remedial investigation activities, into the T-1 excavation for use as backfill. This activity is summarized in Section 5.1.

## 2.0 REMEDIAL ACTION DESCRIPTION

The objectives of the T-1 source removal were to:

- 1) remove all drummed wastes and debris from the trench,
- 2) remove all contaminated soil exceeding Rocky Flats Cleanup Agreement (RFCA) (DOE, 1996) Tier I action levels for radionuclides, volatile organic compounds (VOCs), and cyanide,
- 3) and disposition contaminated soils, drummed waste and debris.

Objectives 1 and 2 were met during Fiscal Year 1998 (see discussion of discovery of additional container in Section 5.2). Unanticipated contaminants encountered during the excavation phase have delayed achievement of objective 3. Unanticipated, widespread chemical contamination was discovered in much of the drummed waste excavated from the trench. As a result, treatment alternatives proposed in the PAM (RMRS, 1998a) are not possible, and alternatives are being investigated. An evaluation of treatment alternatives for the T-1 wastes is included in the *Trench 1 Waste Characterization and Disposition Pathways Analysis Report*, (RMRS, 1999a).

### 3.0 EXCAVATION OF THE T-1 SITE

The excavation of T-1 was conducted between June 10, and August 20, 1998. Table 3-1 lists the coordinates of the perimeter of T-1 following excavation. Table 3-2 lists the general progression of excavation activities with respect to date, location (west to east) within the trench and the quantities and types of materials removed. Large volumes of debris and double stacked (end-on-end) drums were not encountered in the trench as anticipated from interviews with past employees. Excavation was performed with a hydraulic excavator equipped with a 1.5 cubic yard (yd<sup>3</sup>) bucket.

TABLE 3-1 COORDINATES OF T-1 EXCAVATION PERIMETER

| Easting (ft) | Northing (ft) |
|--------------|---------------|
| 2086179.50   | 749483.50     |
| 2086152.75   | 749480.00     |
| 2086114.75   | 749474.50     |
| 2086083.75   | 749469.00     |
| 2086053.75   | 749464.50     |
| 2086027.75   | 749462.69     |
| 2085993.88   | 749458.63     |
| 2085964.00   | 749456.13     |
| 2085953.50   | 749457.31     |
| 2085956.38   | 749437.88     |
| 2085995.50   | 749442.31     |
| 2086029.75   | 749445.13     |
| 2086055.25   | 749449.69     |
| 2086086.00   | 749453.63     |
| 2086117.00   | 749458.63     |
| 2086154.75   | 749465.69     |
| 2086182.00   | 749469.81     |
| 2086179.50   | 749483.50     |

State Plane Coordinates, Colorado Central - 0502, surveyed December 21, 1998.

Material removed from the trench was segregated adjacent to the trench into three broad categories:

- Soil,
- Drummed waste including commingled soil from non-intact drums,
- Debris.

TABLE 3-2 EXCAVATION ADVANCE AND QUANTITIES OF MATERIALS REMOVED

| Date           | No. Drums Excavated |            | No. Excavator Buckets of Soil |                  |                      |              | Excavated Soil (Cubic Yards) |                 | Packed Debris                | No. Full Waste Packages |           |           |            |      |      | Distance Excavated (Feet) |
|----------------|---------------------|------------|-------------------------------|------------------|----------------------|--------------|------------------------------|-----------------|------------------------------|-------------------------|-----------|-----------|------------|------|------|---------------------------|
|                | Intact              | Non-Intact | < 5,000 cpm                   | 5,000-10,000 cpm | > 10,000 cpm (No DU) | > 25 ppm VOC | < 5,000cpm                   | 5,000-10,000cpm |                              | 55-gallon               | 83-gallon | 85-gallon | 110-gallon | B-12 | B-88 |                           |
| 6/10/98        | 0                   | 0          | 9                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to (-)10 mark             |
| 6/12/98        | 0                   | 0          | 55                            | 0                | 0                    | 0            |                              |                 | 1 drum lid                   | 0                       | 0         | 0         | 0          | 2    | 0    | to (-)20 mark             |
| Week Totals    | 0                   | 0          | 64                            | 0                | 0                    | 0            |                              |                 |                              | 0                       | 0         | 0         | 0          | 2    | 0    |                           |
| Totals To Date | 0                   | 0          | 64                            | 0                | 0                    | 0            | 51.2                         | 0               |                              | 0                       | 0         | 0         | 0          | 2    | 0    |                           |
| 6/15/98        | 1                   | 0          | 2                             | 0                | 4                    | 0            |                              |                 | None                         | 0                       | 1         | 0         | 0          | 0    | 0    |                           |
| 6/16/98        | 0                   | 0          | 16                            | 6                | 10                   | 0            |                              |                 | 1 drum lid                   | 0                       | 0         | 0         | 0          | 0    | 3    |                           |
| 6/17/98        | 3                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 3         | 0         | 0          | 0    | 0    |                           |
| 6/18/98        | 2                   | 1          | 3                             | 0                | 0                    | 5            |                              |                 | Drum fragment                | 0                       | 2         | 0         | 0          | 1    | 1    |                           |
| 6/19/98        | 0                   | 2          | 6                             | 0                | 0                    | 3            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 1    | 0    |                           |
| Week Totals    | 6                   | 3          | 27                            | 6                | 14                   | 8            |                              |                 |                              | 0                       | 6         | 0         | 0          | 2    | 4    |                           |
| Totals To Date | 6                   | 3          | 91                            | 6                | 14                   | 8            | 72.8                         | 6.0             |                              | 0                       | 6         | 0         | 0          | 4    | 4    |                           |
| 6/22/98        | 2                   | 3          | 0                             | 0                | 9                    | 0            |                              |                 | 1 drum lid                   | 0                       | 2         | 0         | 0          | 1    | 2    |                           |
| 6/23/98        | 2                   | 2          | 0                             | 4                | 9                    | 1            |                              |                 | 2 lids, 2 drum carcasses     | 0                       | 2         | 0         | 0          | 1    | 2    |                           |
| 6/24/98        | 4                   | 2          | 0                             | 0                | 3                    | 1            |                              |                 | 2 lids, 3 drum carcasses     | 0                       | 4         | 0         | 0          | 1    | 1    |                           |
| 6/25/98        | 7                   | 1          | 0                             | 0                | 15                   | 2            |                              |                 | 4 lids, 2 drum carcasses     | 0                       | 7         | 0         | 0          | 1    | 3    |                           |
| 6/26/98        | 0                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    |                           |
| Week Totals    | 15                  | 8          | 0                             | 4                | 36                   | 4            |                              |                 |                              | 0                       | 15        | 0         | 0          | 4    | 8    |                           |
| Totals To Date | 21                  | 11         | 91                            | 10               | 50                   | 12           | 72.8                         | 9.9             |                              | 0                       | 21        | 0         | 0          | 8    | 12   |                           |
| 6/29/98        | 1                   | 0          | 6                             | 3                | 16                   | 18           |                              |                 | None                         | 0                       | 1         | 0         | 0          | 0    | 9    |                           |
| 6/30/98        | 8                   | 1          | 0                             | 0                | 12                   | 8            |                              |                 | 2 drum lids, piping, cartons | 1                       | 8         | 0         | 1          | 1    | 2    |                           |
| 7/1/98         | 10                  | 0          | 0                             | 0                | 4                    | 0            |                              |                 | cartons w/ abrasives         | 0                       | 10        | 0         | 0          | 0    | 1    |                           |
| 7/2/98         | 0                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    |                           |
| 7/3/98         | 0                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    |                           |
| Week Totals    | 19                  | 1          | 6                             | 3                | 32                   | 26           |                              |                 |                              | 1                       | 19        | 0         | 1          | 1    | 12   |                           |
| Totals To Date | 40                  | 12         | 97                            | 13               | 82                   | 38           | 77.6                         | 12.9            |                              | 1                       | 40        | 0         | 1          | 9    | 24   |                           |
| 7/6/98         | 7                   | 1          | 3                             | 0                | 5                    | 0            |                              |                 | Piping, drum lids            | 0                       | 7         | 0         | 0          | 1    | 1    | to 22' mark               |
| 7/7/98         | 5                   | 1          | 12                            | 3                | 8                    | 0            |                              |                 | 2 drum carcasses, pipe       | 1                       | 4         | 0         | 0          | 1    | 2    | to 34' mark               |
| 7/8/98         | 11                  | 0          | 2                             | 1                | 0                    | 0            |                              |                 | 2' metal piece, sickle       | 11                      | 0         | 0         | 0          | 0    | 0    | to 37' mark               |
| 7/9/98         | 15                  | 0          | 2                             | 0                | 0                    | 0            |                              |                 | 8 drum lids                  | 15                      | 0         | 0         | 0          | 0    | 0    | to 39' mark               |
| 7/10/98        | 0                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to 39' mark               |
| Week Totals    | 38                  | 2          | 19                            | 4                | 13                   | 0            |                              |                 |                              | 27                      | 11        | 0         | 0          | 2    | 3    |                           |
| Totals To Date | 78                  | 14         | 116                           | 17               | 95                   | 38           | 92.6                         | 16.9            |                              | 28                      | 51        | 0         | 1          | 11   | 27   | to 39' mark               |
| 7/13/98        | 5                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | 5 Drum Lids                  | 5                       | 0         | 0         | 0          | 0    | 0    | to 40' mark               |
| 7/14/98        | 5                   | 0          | 10                            | 9                | 2                    | 0            |                              |                 | 4 Drum Lids                  | 5                       | 0         | 0         | 0          | 0    | 0    | to 40' mark               |
| 7/15/98        | 0                   | 0          | 57                            | 6                | 0                    | 1            |                              |                 | 10' length pipe w/ flange    | 0                       | 0         | 0         | 0          | 0    | 0    | to 29' mark               |
| 7/16/98        | 4                   | 0          | 55                            | 3                | 0                    | 0            |                              |                 | 4 Drum Lids                  | 4                       | 0         | 0         | 0          | 0    | 0    | to 35' mark               |
| 7/17/98        | 0                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to 35' mark               |
| Week Totals    | 14                  | 0          | 122                           | 18               | 2                    | 1            |                              |                 |                              | 14                      | 0         | 0         | 0          | 0    | 0    |                           |
| Totals To Date | 92                  | 14         | 238                           | 35               | 97                   | 39           | 214.8                        | 34.7            |                              | 42                      | 51        | 0         | 1          | 11   | 27   |                           |
| 7/20/98        | 5                   | 0          | 18                            | 1                | 0                    | 0            |                              |                 | 6 Drum Lids                  | 5                       | 0         | 0         | 0          | 0    | 0    |                           |
| 7/21/98        | 12                  | 0          | 28                            | 1                | 0                    | 0            |                              |                 | 10 Drum Lids                 | 12                      | 0         | 0         | 0          | 0    | 0    | to 44' mark               |
| 7/22/98        | 13                  | 0          | 45                            | 0                | 0                    | 0            |                              |                 | 5-gal can, 12 drum lids      | 13                      | 0         | 0         | 0          | 0    | 0    | to 50' mark               |
| 7/23/98        | 0                   | 0          | 26                            | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to 58' mark               |
| 7/24/98        | 0                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to 56' mark               |
| Week Totals    | 30                  | 0          | 117                           | 2                | 0                    | 0            |                              |                 |                              | 30                      | 0         | 0         | 0          | 0    | 0    |                           |
| Totals To Date | 122                 | 14         | 355                           | 37               | 97                   | 39           | 349.35                       | 36.7            |                              | 72                      | 51        | 0         | 1          | 11   | 27   |                           |
| 7/27/98        | 0                   | 0          | 47                            | 8                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to 70' mark               |
| 7/28/98        | 3                   | 0          | 63                            | 0                | 0                    | 0            |                              |                 | 1 55-gal drum                | 1                       | 0         | 2         | 0          | 0    | 0    | to 85' mark               |
| 7/29/98        | 0                   | 1          | 66                            | 0                | 9                    | 0            |                              |                 | 2/3 drum carcass             | 0                       | 0         | 0         | 0          | 1    | 2    | to 95' mark               |
| 7/30/98        | 2                   | 1          | 72                            | 0                | 0                    | 0            |                              |                 | 2 drum lids                  | 2                       | 0         | 0         | 0          | 1    | 0    | to 113' mark              |
| 7/31/98        | 0                   | 0          | 45                            | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to 120' mark              |
| Week Totals    | 5                   | 2          | 293                           | 8                | 9                    | 0            |                              |                 |                              | 3                       | 0         | 2         | 0          | 2    | 2    |                           |
| Totals To Date | 127                 | 16         | 648                           | 45               | 106                  | 39           | 686.3                        | 44.6            |                              | 75                      | 51        | 2         | 1          | 13   | 29   |                           |
| 8/3/98         | 3                   | 0          | 72                            | 0                | 0                    | 0            |                              |                 | 3 drum lids, plastic         | 2                       | 0         | 1         | 0          | 0    | 0    | to 128' mark              |
| 8/4/98         | 1                   | 2          | 48                            | 0                | 0                    | 0            |                              |                 | 1 drum lid                   | 1                       | 0         | 1         | 0          | 2    | 0    | to 142' mark              |
| 8/5/98         | 0                   | 3          | 0                             | 2                | 1                    | 0            |                              |                 | 1 drum lid                   | 1                       | 0         | 0         | 0          | 0    | 0    | to 142' mark              |
| 8/6/98         | 0                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to 142' mark              |
| 8/7/98         | 0                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to 142' mark              |
| Week Totals    | 4                   | 5          | 120                           | 2                | 1                    | 0            |                              |                 |                              | 4                       | 0         | 2         | 0          | 2    | 0    |                           |
| Totals To Date | 131                 | 21         | 768                           | 47               | 107                  | 39           | 824.3                        | 46.6            |                              | 79                      | 51        | 4         | 1          | 15   | 29   |                           |
| 8/10/98        | 0                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to 142' mark              |
| 8/11/98        | 0                   | 0          | 77                            | 0.25             | 5                    | 0            |                              |                 | 1 lid, wire, rebar           | 0                       | 0         | 0         | 0          | 0    | 2    | to 152' mark              |
| 8/12/98        | 3                   | 0          | 69                            | 0                | 0                    | 0            |                              |                 | 3 drum lids, piece plastic   | 0                       | 0         | 3         | 0          | 0    | 0    | to 166' mark              |
| 8/13/98        | 0                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to 166' mark              |
| 8/14/98        | 8                   | 1          | 15                            | 0                | 3                    | 0            |                              |                 | 8 drum lids                  | 0                       | 0         | 8         | 0          | 2    | 0    | to 167' mark              |
| Week Totals    | 11                  | 1          | 161                           | 0.25             | 8                    | 0            |                              |                 |                              | 0                       | 0         | 11        | 0          | 2    | 2    |                           |
| Totals To Date | 142                 | 22         | 929                           | 47.25            | 115                  | 39           | 1009.5                       | 46.9            |                              | 79                      | 51        | 15        | 1          | 17   | 31   |                           |
| 8/17/98        | 0                   | 1          | 31                            | 5                | 6                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 3    | 1    | to 175' mark              |
| 8/18/98        | 0                   | 2          | 6                             | 1                | 0                    | 0            |                              |                 | 2 drum rings                 | 0                       | 0         | 0         | 0          | 3    | 0    | to 184' mark              |
| 8/19/98        | 0                   | 2          | 3                             | 7                | 20                   | 0            |                              |                 | 1 drum ring                  | 0                       | 0         | 0         | 0          | 2    | 5    |                           |
| 8/20/98        | 0                   | 0          | 33                            | 15               | 17                   | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 4    | to 210' mark              |
| 8/21/98        | 0                   | 0          | 0                             | 0                | 0                    | 0            |                              |                 | None                         | 0                       | 0         | 0         | 0          | 0    | 0    | to 210' mark              |
| Week Totals    | 0                   | 5          | 73                            | 28               | 43                   | 0            |                              |                 |                              | 0                       | 0         | 0         | 0          | 8    | 10   |                           |
| Totals To Date | 142                 | 28         | 1002                          | 75.25            | 158                  | 39           | 1093.4                       | 74.6            |                              | 79                      | 51        | 15        | 1          | 25   | 41   |                           |

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### 3.1 Excavation and Segregation of Soil

All soil removed from the trench was screened for VOCs and radionuclides to support segregation as described in Table 3-3. Sections 4.2 and 6.6 of this report give a more descriptive analysis of the results of the soil segregation activities.

TABLE 3-3 APPROACH TO SEGREGATION OF EXCAVATED T-1 SOIL

| Material  | Initial Screening Methods           | Rule   | Decision/Segregation Category   | Final Volume                        |
|---|-------------------------------------|--|---|-------------------------------------|
| Overburden soil<br>(low potential for<br>pyrophoricity) | Visual Observation<br>FIDLER<br>OVA | No significant staining<br>FIDLER <5,000 cpm<br>OVA < 25 ppm above background        | Segregated to Stockpile 1<br>(for return to T-1)  | 1,093.4 yd <sup>3</sup><br>(approx) |
|   |                                     | No significant staining<br>FIDLER 5,000 -10,000 cpm<br>OVA < 25 ppm above background | Segregated to Stockpile 2<br>(later transferred to B-88s<br>for future MLLW<br>disposition) | 74.6 yd <sup>3</sup>                |
|   |                                     | No significant staining<br>FIDLER > 10,000 cpm<br>OVA < 25 ppm above background      | Containerized in B-88s for<br>future MLLW disposition                                       | 106.5 yd <sup>3</sup>               |
|   |                                     | Significant staining<br>or OVA ≥ 25 ppm above<br>background                          | Containerize in B-88s.<br>Disposition uncertain   | 35.5 yd <sup>3</sup><br>(approx)    |

### 3.2 Excavation and Segregation of Drummed Waste

One hundred seventy one drums or containers were removed from T-1 during excavation activities. Intact drums containing depleted uranium and cemented cyanide were removed from the trench, initially characterized, and if they had sufficient structural integrity for hoisting, placed in an overpack drum. If the intact drums did not have sufficient structural integrity, they were placed in 1.6 yd<sup>3</sup> B-12 type waste boxes. All ten drums of cemented cyanide waste were able to be overpacked into drums. One hundred thirty one of one hundred sixty one (~80%) drums of the radioactive metal (e.g., DU) waste were in a condition which allowed for overpacking. At least five of these 131 drums were deteriorated such that they could not contain liquids, however were still capable of being overpacked. Close inspection of the outside of the drums for pinholes was generally not performed as getting the material to a stable (inerted) state was the primary objective. The remainder (deteriorated drums) were placed into B-12s and covered (inerted) with soil.

All DU and cemented cyanide waste packages were then transferred to the Sampling and Inerting Pad (SIP) where the contents were further characterized, sampled, and segregated, as required. Drums containing DU chips and turnings were stabilized by inerting with mineral oil at the SIP, while B-12 boxes containing deteriorated drum carcasses, DU and soil were further "topped off" with soil to ensure stabilization. Following activities at the SIP, waste packages were temporarily staged within the tent awaiting transfer to the Waste Container Staging Area located outside of the temporary structure.

### 3.3 Excavation and Segregation of Debris

Other than drum carcasses very little debris was encountered during the T-1 excavation. The non-intact drums were loaded into B-12s with DU and commingled soil. Drum fragments were typically removed as practical, verified free of DU chips/turnings and then placed in a separate B-12 or 3.55 yd<sup>3</sup> B-88 waste box. The other types of debris encountered included a few pieces of pipe, "ice cream cartons" used to hold what was thought to be DU floor sweepings from Building 444, and material similar to sand paper. Section 6.4 lists more descriptive analysis of the debris.

### 3.4 Occurrences During Excavation

Several unexpected conditions were encountered during excavation that caused a temporary pause in operation. Considerable efforts were then made by the project team to evaluate the unexpected condition(s) and ensure that proper controls were in place prior to restarting activities. In all of the following cases, the T-1 Project team reacted to the occurrence in accordance with approved procedures. This section details the major pauses which were all related to encountering unexpected materials or conditions during the excavation activities:

- Rapid oxidation of DU (pyrophoric activity)
- Uranium hydride potentially containing tritium
- Asbestos within the cemented cyanide matrix

Several other pauses of a less significant nature than those stated above also occurred during the project. Details of these are contained in the project files.

### 3.4.1 Rapid Oxidation of DU

On the first day of excavation (June 10) activities were suspended, following removal of the first drum, when temperature measurements and visual observations indicated a rapid oxidation of the non-intact drum contents. The observations made trench side included a rapid temperature rise and emanation of smoke from the drum of DU. Changes initiated as a result included increasing the frequency of temperature monitoring from periodic to continuous monitoring of DU until completion of inerting activities, and returning non-intact drums to the trench when changes in temperature measurements exceeded action levels. The restart request letter (WRS-030-98) describing the events is contained in Appendix A-1.

### 3.4.2 Potential $\text{UH}_3$ /Tritium

On August 5, 1998 several old sample bottles were unearthed in the trench with a marking of "25 gm  $\text{UH}_3$  in ..... unknown" on one of the containers. The chemical abbreviation  $\text{UH}_3$  designates uranium hydride. Another container had the marking "*TU metal powder*"; "TU" was an abbreviation used at Rocky Flats for "tuballoy" a synonym for depleted uranium. These sample bottles (approximately 30 ml and 250 ml volumes) were located in two small steel cans (about five gallon capacity) with a marking of "*to Rocky Flats from Lawrence Livermore*" on at least one of the cans. One of the sample bottles broke open as it was being unearthed and small flames were observed on two occasions, possibly on some packing material (insulating sleeve) surrounding the sample jar. Shortly after the flames were observed, personnel got the material in a stable configuration and exited the tent.

During a meeting with RFETS fire protection engineering personnel, a radiological engineer noted that uranium hydride was sometimes used as a "getter", a material used to store large amounts of tritium, and that this method of storage had been used at Lawrence Livermore National Laboratory. It became apparent that if the " $\text{UH}_3$ " material contained tritium, that a release may have occurred. The project team immediately began an investigation to determine if tritium had been released.

The investigation first involved sampling the plastic anti-contamination bags used to cover the various field monitoring equipment that were in use in the tent during the event. This effort was done without making an entry into the tent. The materials being sampled, because of the absorptive characteristics and proximity to the flame would likely show evidence of tritium contamination if there had been a release of tritium. Nine plastic bags were sampled the evening

of August 5, 1998 for a gross (non-quantitative) tritium analysis performed at the on-site Thermo NuTech (TNU) laboratory, and subsequent offsite analysis at Environmental Physics Inc., (EPI). Results from TNU were received the next morning (August 6) and did not show the presence of tritium. Another entry was made August 7 to collect samples from water, soil and other material in close proximity to the original event. These were analyzed by TNU onsite on August 7 and also shipped to EPI for additional analysis. All results, including those received from EPI on August 10 concluded that tritium was not present in any of the material sampled. The "UH<sub>3</sub>" material itself was never sent for tritium analysis because of safety concerns associated with transportation and handling of this highly reactive material. Tritium analysis performed in support of this investigation was conducted under sample numbers 98A2121-001 to -018.

Based upon subsequent gamma spectroscopy analysis of the material (samples 98A2105-187, 203, 204, 207) contained in the unearthed sample bottles, it was determined that the material sampled was not DU but rather had isotopic U-235 to U-238 mass ratios more indicative of natural uranium. Note that the historic sample bottle labeled "*TU metal powder*" was not sampled because it was assumed to be known material (i.e., DU).

Considering the gamma spectroscopy results, it is assumed that the UH<sub>3</sub> contains a natural isotopic uranium distribution. Air monitoring results described in Section 4.3 confirm that isotopic ratios identified from a filter collected from a trench side air monitoring station (T1-B) after the fire indicated elevated "natural uranium" at essentially the same isotopic mix as the historic "UH<sub>3</sub>" samples themselves. This was the only natural uranium isotopic distribution observed from trench side air monitoring stations during the excavation. Assuming that the "UH<sub>3</sub>" material contains a natural isotopic uranium distribution, it is probable that the sample that caused the "flame up" was originally "UH<sub>3</sub>" material. Analysis of the air filter also indicated no tritium above background levels which further suggests that this "UH<sub>3</sub>" was not a source of tritium.

On August 10, 1998, a limited restart letter was issued (WRS-049-98) for continuation of all T-1 activities except sampling of waste containing "UH<sub>3</sub>". The final restart letter addressing sampling of the "UH<sub>3</sub>" material (WRS -051-98) was issued on September 1, 1998 (See Appendix A-2).

During backfilling operations on December 18, 1998 a five-gallon container was discovered in the sidewall of the trench. The excavation of this container and related investigations are discussed in Section 5.2. This container contained historic sample bottles similar to those

discussed earlier. On March 10, 1999, T-1 personnel were inerting two jars of "uranium hydride" material removed from the container (REF: RFO--KHLL-ENVOPS-1998-002). The activity occurred in a soft-sided containment constructed to assist in the manual extraction of the container from the trench wall. Prior to this event, the two samples were analyzed using gamma spectroscopy and the results were indicative of natural uranium considering the tolerances established for isotopic uranium ratios for the project. The two glass sample jars were placed in a 55-gallon steel drum on a layer of soil. The first sample jar which also contained a small amount of liquid was covered with soil, followed by the second sample jar which contained no liquid. The first sample jar was broken; there was no response from a tritium detector placed near the jars. The second sample jar was then broken. Approximately two to three seconds later, the alarm sounded on the tritium detector. The alarm point was set at  $25 \mu\text{Ci}/\text{m}^3$ ; the local indicator showed a maximum reading of  $49 \mu\text{Ci}/\text{m}^3$  and then began falling as the instrument cleared itself. Project personnel poured an additional five-gallon bucket of soil over the inerted samples, began a controlled evacuation of the soft-sided containment and T-1 tent. RCT's supporting the activities inside the soft-sided containment surveyed the surface of the material in the 55-gallon drum for beta contamination that might have triggered the alarm. All personnel that were inside the soft-sided containment were checked by RCT's to determine if there was any spread of contamination. No spread of contamination was discovered.

Personnel involved in the activity completed a short debriefing. At the debriefing, all personnel inside the T-1 weather structure at the time of the event were directed to report to Occupational Medicine for bioassay sampling, and notifications of the event were made.

The following day, after issuance of a limited restart letter, RLG-011-99 (See Appendix A-2), twelve samples were collected for tritium analysis (samples 99A5915-001 to -009, -012, -013). The samples were collected from items that could contain tritium if a tritium release had occurred (e.g., poly and cardboard liner of drum D93476, air mover inlet, etc.). The samples were analyzed at an onsite and offsite laboratory. One sample (99A5915-013.002) indicated tritium above the Minimum detectable Activity (MDA). This sample was collected as a smear sample from the poly ball on a radiological monitoring instrument and indicated tritium activity at 150 pCi/wipe. The corresponding MDA was 120 pCi/wipe with an error 82 pCi/wipe. Results of tritium bioassay analysis indicated low levels of tritium uptake occurred in some of the workers located adjacent to the inerting operations. The tritium uptakes were assigned to several individuals as the bioassay results were all above the Decision Level for tritium, but most were below the Detection Limit (i.e., MDA) for tritium. The doses assigned were all in the micro-rem range.

### 3.4.3 Discovery of Asbestos in Cemented Cyanide Waste

Excavation activities were also suspended on August 12, 1998 due to an observation of asbestos-like material in the cemented matrix of drums containing cyanide waste. Ten drums of cemented cyanide were expected to be encountered during the excavation based on historical reports, however, no indication was given that the cemented cyanide waste contained asbestos. T-1 personnel noticed what appeared to be asbestos during sampling of the drums on August 12. As a result, personnel from an offsite laboratory were called to Rocky Flats that evening and confirmed the presence of asbestos (15-25% by volume) in the samples evaluated. The following morning all personnel requiring asbestos awareness received the appropriate training. Asbestos samples were also collected from the Continuous Air Monitors (CAMs) and other materials located at the tent vestibules. No asbestos was detected, indicating asbestos was not released. A release was not expected as the cemented media was relatively damp and intrusive sampling activities would have little chance of causing a release in the damp matrix. Analytical results from the cemented cyanide can be found in samples 98A2109-001 through -014. The project restart letter, WRS-053-98 was issued on August 13 (See Appendix A-3).

## 4.0 VERIFICATION SAMPLING

This section describes the verification sampling conducted in support of the excavation phase of the T-1 project. Included are descriptions of the excavation and stockpile verification sampling and the air monitoring performed around the trench.

### 4.1 Excavation Verification Sampling

In accordance with the T-1 Sampling and Analysis Plan (SAP, RMRS, 1998c), soil samples from the floor and sidewalls of the trench excavation were collected and analyzed for radionuclide and non-radionuclide contaminants of concern. A summary of the results of the radiological and chemical analysis are presented in Tables 4-1 and 4-2, respectively. The corresponding sample locations are depicted in Figure 4-1. The analytical results indicate that for all contaminants of concern, concentrations are well below RFCA action levels, and that sum-of-ratios are less than one, which is an indicator for evaluating risk posed by the collective summation of radionuclides. These results indicate, with satisfactory statistical confidence, that contaminants previously in the trench have been successfully remediated relative to RFCA action levels.

Sample results were used for decision-making on a sample-by-sample basis, i.e., for each grid cell associated with each particular sample. This approach, as described in the SAP (RMRS, 1998c), was not statistical but rather deterministic and more conservative in that any one sample exceeding the RFCA criteria was required to be remediated and resampled. No individual samples on the floor or on the walls exceeded RFCA thresholds, and therefore, no additional remediation beyond the original excavation was warranted.

Accuracy and precision of the sample results were adequate based on gamma spectroscopy quality controls and evaluation of concentration variability, both within individual sampling cells (of the sampling grid) and throughout the excavation population as a whole. Samples were representative of the excavation boundaries based on compliance with the RMRS SAP.

#### 4.2 Stockpile Verification Sampling

Two soil stockpiles were used to support T-1 excavation activities. Each stockpile was segregated and filled with excavated soil based on radiological field screening of the soil. Previous remedial activities at Rocky Flats indicated that soil segregated based on screening results below 5,000 counts per minute (cpm) using a Field Instrument for the Detection of Low energy Radiation (FIDLER) were likely to have concentrations of radionuclides below applicable RFCA action levels. The other soil stockpile was used to see if soil above 5,000 cpm (i.e., 5,000-10,000 cpm) would also fall below the appropriate RFCA action-levels, thus reducing the volume of soil requiring packaging and offsite disposal. Both soil stockpiles were sampled following excavation. The following two subsections address each stockpile.

##### 4.2.1 Less than 5,000 cpm Stockpile

The clean soil stockpile (Stockpile 1) consisted of almost 1,100 yd<sup>3</sup> of excavated soil that was originally segregated based on FIDLER instrument readings of less than 5,000 cpm. Three samples from the clean soil stockpile were collected and analyzed to characterize the soil stockpile as prescribed in the T-1 SAP (RMRS, 1998c). The samples were analyzed for volatile organic compounds and for radionuclides using gamma spectroscopy. No VOCs were detected in any of the samples. The gamma spectroscopy data were evaluated based on the Environmental Protection Agency's (EPA) G-4 algorithm for determining the minimum amount of samples required for a given statistical confidence level (EPA, 1994. *Guidance for the Data Quality Objectives Process*, EPA QA/G-4, Document No. EPA/600/R-96/055). The algorithm was modified in two ways:

TABLE 4-1 SUMMARY OF RADIONUCLIDE RESULTS FROM EXCAVATION FLOOR  
AND SIDEWALLS

| Sample Number | Location | QC Type | Collection Date | Am-241 (pCi/g) | Pu-239/240 (pCi/g) | U-234 (pCi/g) | U-235 (pCi/g) | U-238 (pCi/g) | Sum-of-Ratios Tier I |
|---------------|----------|---------|-----------------|----------------|--------------------|---------------|---------------|---------------|----------------------|
| 98A2111-001   | EB0200   | REAL    | 8/27/98         | 0.51           | 2.23               | 2.41          | 0.27          | 2.41          | 0.01                 |
| 98A2111-002   | EB0401   | REAL    | 8/31/98         | 0.38           | 1.69               | 3.30          | 0.20          | 3.30          | 0.01                 |
| 98A2111-003   | EB0301   | REAL    | 8/27/98         | 0.46           | 2.01               | 5.12          | 0.25          | 5.12          | 0.02                 |
| 98A2111-004   | EB0201   | REAL    | 8/27/98         | 0.54           | 2.39               | 2.52          | 0.27          | 2.52          | 0.01                 |
| 98A2111-005   | EB0101   | REAL    | 8/27/98         | 0.40           | 1.74               | 2.04          | 0.23          | 2.04          | 0.01                 |
| 98A2111-006   | EB0402   | REAL    | 8/31/98         | 0.42           | 1.85               | 6.64          | 0.22          | 6.64          | 0.02                 |
| 98A2111-007   | EB0302   | REAL    | 8/27/98         | 0.50           | 2.18               | 2.53          | 0.26          | 2.53          | 0.01                 |
| 98A2111-008   | EB0202   | REAL    | 8/27/98         | 0.49           | 2.16               | 2.53          | 0.28          | 2.53          | 0.01                 |
| 98A2111-009   | EB0102   | REAL    | 8/27/98         | 0.42           | 1.83               | 2.36          | 0.23          | 2.36          | 0.01                 |
| 98A2111-010   | EB0403   | REAL    | 8/31/98         | 0.42           | 1.83               | 2.24          | 0.24          | 2.24          | 0.01                 |
| 98A2111-011   | EB0303   | REAL    | 8/27/98         | 0.44           | 1.93               | 2.54          | 0.25          | 2.54          | 0.01                 |
| 98A2111-012   | EB0203W  | REAL    | 8/27/98         | 0.43           | 1.88               | 2.19          | 0.24          | 2.19          | 0.01                 |
| 98A2111-013   | EB0203C  | REAL    | 8/27/98         | 0.41           | 1.80               | 1.49          | 0.24          | 1.49          | 0.01                 |
| 98A2111-014   | EB0203E  | REAL    | 8/27/98         | 0.43           | 1.88               | 4.52          | 0.25          | 4.52          | 0.02                 |
| 98A2111-015   | EB0203E  | DUP     | 8/27/98         | 0.46           | 2.01               | 4.41          | 0.25          | 4.41          | 0.02                 |
| 98A2111-016   | EB0103   | REAL    | 8/27/98         | 0.44           | 1.94               | 4.54          | 0.25          | 4.54          | 0.02                 |
| 98A2111-017   | EB0404   | REAL    | 8/31/98         | 0.52           | 2.29               | 5.08          | 0.28          | 5.08          | 0.02                 |
| 98A2111-018   | EB0304   | REAL    | 8/28/98         | 0.40           | 1.78               | 3.75          | 0.19          | 3.75          | 0.01                 |
| 98A2111-019   | EB0204   | REAL    | 8/28/98         | 0.44           | 1.92               | 4.11          | 0.22          | 4.11          | 0.01                 |
| 98A2111-020   | EB0104   | REAL    | 8/28/98         | 0.44           | 1.93               | 3.86          | 0.14          | 3.86          | 0.01                 |
| 98A2111-021   | EB0405   | REAL    | 8/31/98         | 0.42           | 1.84               | 4.51          | 0.13          | 4.51          | 0.01                 |
| 98A2111-022   | EB0305W  | REAL    | 8/28/98         | 0.43           | 1.88               | 4.24          | 0.16          | 4.24          | 0.01                 |
| 98A2111-023   | EB0305C  | REAL    | 8/28/98         | 0.48           | 2.10               | 4.35          | 0.24          | 4.35          | 0.02                 |
| 98A2111-024   | EB0305E  | REAL    | 8/28/98         | 0.42           | 1.85               | 2.56          | 0.22          | 2.56          | 0.01                 |
| 98A2111-025   | EB0205   | REAL    | 8/28/98         | 0.44           | 1.92               | 4.49          | 0.08          | 4.49          | 0.01                 |
| 98A2111-026   | EB0105   | REAL    | 8/28/98         | 0.48           | 2.11               | 2.34          | 0.25          | 2.34          | 0.01                 |
| 98A2111-027   | EB0406   | REAL    | 8/31/98         | 0.44           | 1.96               | 4.30          | 0.25          | 4.30          | 0.02                 |
| 98A2111-028   | EB0406   | DUP     | 8/31/98         | 0.40           | 1.78               | 3.95          | 0.23          | 3.95          | 0.01                 |
| 98A2111-029   | EB0306   | REAL    | 8/28/98         | 0.48           | 2.10               | 2.29          | 0.24          | 2.29          | 0.01                 |
| 98A2111-030   | EB0206   | REAL    | 8/28/98         | 0.44           | 1.94               | 2.05          | 0.25          | 2.05          | 0.01                 |
| 98A2111-031   | EB0106   | REAL    | 8/28/98         | 0.42           | 1.84               | 2.03          | 0.24          | 2.03          | 0.01                 |
| 98A2111-032   | EB0407   | REAL    | 8/31/98         | 0.43           | 1.91               | 2.15          | 0.24          | 2.15          | 0.01                 |
| 98A2111-033   | EB0307   | REAL    | 8/28/98         | 0.40           | 1.77               | 2.03          | 0.20          | 2.03          | 0.01                 |
| 98A2111-034   | EB0207   | REAL    | 8/28/98         | 0.41           | 1.82               | 2.13          | 0.23          | 2.13          | 0.01                 |
| 98A2111-035   | EB0107   | REAL    | 8/28/98         | 0.54           | 2.36               | 2.75          | 0.29          | 2.75          | 0.01                 |
| 98A2111-036   | EB0408   | REAL    | 8/31/98         | 0.49           | 2.16               | 2.34          | 0.28          | 2.34          | 0.01                 |
| 98A2111-037   | EB0308   | REAL    | 8/31/98         | 0.47           | 2.05               | 2.48          | 0.25          | 2.48          | 0.01                 |
| 98A2111-038   | EB0308   | DUP     | 8/31/98         | 0.43           | 1.90               | 2.31          | 0.25          | 2.31          | 0.01                 |
| 98A2111-039   | EB0309C  | REAL    | 8/31/98         | 0.48           | 2.10               | 4.84          | 0.23          | 4.84          | 0.02                 |
| 98A2111-040   | EB0309E  | REAL    | 8/31/98         | 0.51           | 2.26               | 2.43          | 0.15          | 2.43          | 0.01                 |
| 98A2111-041   | EB0208   | REAL    | 8/31/98         | 0.47           | 2.08               | 2.42          | 0.25          | 2.42          | 0.01                 |
| 98A2111-042   | EB0108   | REAL    | 8/31/98         | 0.51           | 2.22               | 5.15          | 0.30          | 5.15          | 0.02                 |
| 98A2111-043   | EB0409   | REAL    | 8/31/98         | 0.51           | 2.26               | 11.88         | 0.32          | 11.88         | 0.03                 |
| 98A2111-044   | EB0309W  | REAL    | 8/31/98         | 0.46           | 2.02               | 4.59          | 0.26          | 4.59          | 0.02                 |
| 98A2111-045   | EB0209   | REAL    | 8/31/98         | 0.47           | 2.05               | 4.64          | 0.24          | 4.64          | 0.02                 |
| 98A2111-046   | EB0109   | REAL    | 8/31/98         | 0.41           | 1.82               | 4.03          | 0.23          | 4.03          | 0.01                 |
| 98A2111-047   | EB0211   | REAL    | 8/31/98         | 0.44           | 1.93               | 2.19          | 0.26          | 2.19          | 0.01                 |
| 98A2111-051   | EB0410   | REAL    | 8/31/98         | 0.40           | 1.76               | 4.00          | 0.21          | 4.00          | 0.01                 |
| 98A2111-052   | EB0310   | REAL    | 8/31/98         | 0.49           | 2.17               | 5.35          | 0.24          | 5.35          | 0.02                 |
| 98A2111-053   | EB0210   | REAL    | 8/31/98         | 0.50           | 2.22               | 4.80          | 0.21          | 4.80          | 0.02                 |
| 98A2111-054   | EB0110   | REAL    | 8/31/98         | 0.51           | 2.23               | 4.45          | 0.27          | 4.45          | 0.02                 |

Tier I Subsurface Soil Action Levels

215

1429

1738

135

586

Notes: For results less than MDA, MDA is reported. U-238 concentration is derived from Pa-234m when detected and Th-234 when Pa-234m is not detected. U-234 concentration is derived directly from U-238 concentration in accordance with the SAP (RMRS, 1998c). All results are on a dry basis.



TABLE 4-2 SUMMARY OF ANALYTICAL CHEMISTRY RESULTS FROM EXCAVATION FLOOR  
AND SIDEWALLS (all concentrations in ug/kg)

| RIN-EVENT    | Location<br>(RFCA Action Levels) | Acetone<br>2.74E+06 | Carbon disulfide<br>4.32E+04 | Methylene Chloride<br>5.77E+03 | 2-Butanone<br>TBD | Bromochloroform<br>1.79E+05 | Toluene<br>2.04E+08 | PCE<br>1.15E+04 | TCE<br>9.27E+03 | PCBs <sup>1,2</sup><br>9.50E+04 | Cyanide<br>TBD |
|--------------|----------------------------------|---------------------|------------------------------|--------------------------------|-------------------|-----------------------------|---------------------|-----------------|-----------------|---------------------------------|----------------|
| 98A2111-001  | EB0200                           | 34                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-002  | EB0401                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-003  | EB0301                           | 15                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-004  | EB0201                           | 14                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-005  | EB0101                           | 15                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-006  | EB0402                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-007  | EB0302                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-008  | EB0202                           | 16                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-009  | EB0102                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-010  | EB0403                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-011  | EB0303                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-012  | EB0203W                          | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-013  | EB0203C                          | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-014  | EB0203E                          | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-015  | EB0203E                          | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-016  | EB0103                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-017  | EB0404                           | 15                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-018  | EB0304                           | 70                  | B                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-019  | EB0204                           | 32                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-020  | EB0104                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-021  | EB0405                           | 32                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-022  | EB0305W                          | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-023  | EB0305C                          | 16                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-024  | EB0305E                          | 15                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-025  | EB0205                           | 33                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-026  | EB0105                           | 34                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-027  | EB0406                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-028  | EB0306                           | 18                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-029  | EB0206                           | 16                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-030  | EB0106                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-031  | EB0407                           | 26                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-032  | EB0307                           | 15                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-033  | EB0207                           | 40                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-034  | EB0107                           | 25                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-035  | EB0408                           | 20                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-036  | EB0308                           | 17                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-037  | EB0208                           | 60                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-038  | EB0108                           | 27                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-041  | EB0409                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-042  | EB0309                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-043  | EB0209                           | 2                   | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-044  | EB0109                           | 54                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-039  | EB0410                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-040  | EB0310                           | 25                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-045  | EB0210                           | 35                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-046  | EB0110                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-051  | EB0411                           | 50                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-052  | EB0311                           | 20                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-053  | EB0211                           | 16                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-054  | EB0111                           | 27                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| 98A2111-047  | EB0211                           | 43                  | J                            | 25                             | U                 | J                           | 25                  | U               | 25              | U                               | NA             |
| SAMPLE TALLY |                                  | 48 real, 3 QC       | 48 real, 3 QC                | 48 real, 3 QC                  | 48 real, 3 QC     | 48 real, 3 QC               | 48 real, 3 QC       | 48 real, 3 QC   | 48 real, 3 QC   | 38 real, 2 QC                   | 8 real         |

<sup>1</sup>Table represents compounds detected at least once (from drum samples) in the project; no other compounds were detected by the analytical methods used  
<sup>2</sup>PCBs include Aroclor-1016,1221,1232,1248,1254,1260; typical detection limits ranged from 90 to 170 ug/kg  
<sup>3</sup>From RFCA Attachment 5, Table 4 - Tier I Subsurface Soil Action Levels (note that these levels are more conservative than Tier II Surface Soil Action Levels)  
<sup>4</sup>RFCA Action Level given is for Aroclor-1016, which is the most conservative

KEY for Laboratory Qualifiers  
 U = Below Detection Limit  
 J = Estimated Concentration  
 B = Found in Laboratory Blank

Best Available Copy

- the t-statistic was substituted for the Z-score based on the small number of samples representing the stockpile population; this approach is more conservative and results in a higher estimate of samples needed, and
- a lognormal transformation of the data was performed based on the lognormal distribution of radionuclides in the RFETS environment (historical data for several RFETS Operable Units have established this statistical characteristic). Assumptions of normality, when the data are more accurately lognormal, would result in estimates that are biased low for adequate sample quantities, but are provided in the spreadsheet for comparative purposes.

Reduction and analysis of the sample data is presented in Table 4-3. Based on a data quality objective (DQO) of at least 90% confidence in the number of samples needed to adequately characterize the stockpile (relative to RFCA Tier II Subsurface Soil Action Levels for radionuclides), and based on the lognormality of radionuclide data, a minimum of 15 total samples was calculated to be required.

Based on the three-dimensional geometry of the soil stockpile (cone-shaped, with a height of approximately 16 feet), and the associated radiological and general Health & Safety issues associated with its geometry and location in the T-1 structure, sampling was limited to a systematic design. The grid was designed to collect representative samples symmetrically around the basal perimeter of the stockpile (in contrast to a simple random sample design). Although not truly random, such a design should be representative of the trench excavation based on mixing of the soils during formation of the pile from the northern to the southern portions of the pile. Samples were acquired at approximately five feet above grade, at a regular lateral spacing around the periphery of the stockpile, and from approximately 2 to 18 inches in depth; schematics of the design and additional detail is documented in the T-1 Project Sampling Logbook (RMRS Control No. ER-IHSS108-LB-98-338).

Results of the data set from stockpile sampling are presented in Table 4-3. Relative to Tier II action levels, and using the lognormal 95% Upper Confidence Limit (UCL) for all RFCA radionuclide concentrations in the sum-of-ratios, the sum results in a value well less than one, which indicated that the soil stockpile, in total, was satisfactory for return to the excavation.

TABLE 4-3 SUMMARY OF RADIONUCLIDE ANALYTICAL RESULTS FOR THE  
CLEAN SOIL STOCKPILE

| Sample Number                         | QC Type | Collection Date | Am-241 (pCi/g) | Pu-239/240 (pCi/g) | U-234 (pCi/g) | U-235 (pCi/g) | U-238 (pCi/g) |                |
|---------------------------------------|---------|-----------------|----------------|--------------------|---------------|---------------|---------------|----------------|
| 98A2112-001                           | REAL    | 8/25/98         | 0.44           | 1.93               | 22.77         | 0.63          | 22.77         |                |
| 98A2112-002                           | REAL    | 8/25/98         | 0.60           | 2.66               | 3.23          | 0.18          | 3.23          |                |
| 98A2112-003                           | REAL    | 8/25/98         | 0.76           | 3.34               | 50.67         | 0.90          | 50.67         |                |
| 98A2112-004                           | DUP     | 8/25/98         | 0.92           | 4.06               | 82.28         | 1.23          | 82.28         |                |
| 98A2112-006                           | REAL    | 9/2/98          | 0.61           | 2.67               | 8.61          | 0.23          | 8.61          |                |
| 98A2112-007                           | REAL    | 9/2/98          | 0.71           | 3.13               | 13.97         | 0.46          | 13.97         |                |
| 98A2112-008                           | REAL    | 9/2/98          | 1.18           | 5.21               | 26.60         | 0.78          | 26.60         |                |
| 98A2112-009                           | REAL    | 9/2/98          | 0.50           | 2.18               | 3.44          | 0.18          | 3.44          |                |
| 98A2112-010                           | REAL    | 9/2/98          | 0.76           | 3.34               | 26.05         | 0.61          | 26.05         |                |
| 98A2112-011                           | REAL    | 9/2/98          | 0.65           | 2.88               | 13.59         | 0.27          | 13.59         |                |
| 98A2112-012                           | REAL    | 9/2/98          | 0.77           | 3.38               | 40.20         | 0.60          | 40.20         |                |
| 98A2112-013                           | REAL    | 9/2/98          | 0.82           | 3.61               | 5.27          | 0.24          | 5.27          |                |
| 98A2112-014                           | REAL    | 9/2/98          | 2.39           | 10.53              | 17.05         | 0.22          | 17.05         |                |
| 98A2112-015                           | REAL    | 9/2/98          | 0.60           | 2.66               | 23.88         | 0.44          | 23.88         |                |
| 98A2112-016                           | REAL    | 9/2/98          | 0.24           | 1.03               | 4.98          | 0.25          | 4.98          |                |
| 98A2112-017                           | REAL    | 9/2/98          | 0.63           | 2.78               | 13.82         | 0.44          | 13.82         |                |
| Mean Value                            |         |                 | 0.79           | 3.47               | 20.38         | 0.45          | 20.38         |                |
| Standard Deviation                    |         |                 | 0.49           | 2.17               | 20.07         | 0.29          | 20.07         |                |
| Variance                              |         |                 | 0.24           | 4.72               | 402.79        | 0.08          | 402.79        |                |
|                                       |         |                 |                |                    |               |               |               |                |
| Tier I Subsurface Soil Action Levels  |         |                 | 215            | 1429               | 1738          | 135           | 586           |                |
| Tier II Subsurface Soil Action Levels |         |                 | 38             | 252                | 307           | 24            | 103           |                |
|                                       |         |                 |                |                    |               |               |               | Sum-of-Ratios  |
| H statistic                           |         |                 | 2.068          | 2.068              | 2.6           | 2.17          | 2.6           | Tier I Tier II |
| Normal 95% UCL                        |         |                 | 1.01           | 4.46               | 29.51         | 0.58          | 29.51         | 0.08 0.45      |
| LogNormal 95% UCL                     |         |                 | 1.04           | 4.56               | 40.57         | 0.64          | 40.57         | 0.11 0.60      |

Notes:

(based on stkp-gamma-final.xls)

For results less than MDA, MDA is reported

U-238 concentration is derived from Pa-234m when detected and Th-234 when Pa-234m is not detected

U-234 concentration is derived directly from U-238 concentration in accordance with the SAP (RMRS, 1998c)

All results are on a dry basis

The duplicate sample 98A2112-004 is used in calculations in lieu of 98A2112-003 (corresponding real) because it is conservative (higher concentration)

#### 4.2.2 5,000 cpm to 10,000 cpm Stockpile

Soil placed in Stockpile 2 contained soil that was segregated based on radionuclide screening between 5,000 and 10,000 cpm with a FIDLER. It was thought possible that soil with FIDLER

values below 10,000 cpm could have radionuclide soil concentrations below the RFCA Tier I Subsurface Soil Action Levels (using a sum-of-ratio evaluation), and could potentially be returned to T-1 as backfill. However, analytical data did not support this assumption. Five samples (RIN 98A2113) were collected in accordance with the T-1 SAP (RMRS, 1998c) to make the evaluation. Results indicated that the soil was at the Tier I action level and approximately five times the Tier II action level for radionuclides. As a result, this soil was not considered acceptable for return to the excavation and was subsequently placed in twenty-one B-88 waste boxes. This material is further addressed in Section 6.6 of this report.

#### 4.3 T-1 Ambient Air Monitoring

An enhanced, project-specific ambient air monitoring program was implemented during excavation, segregation, sampling, and inerting of depleted uranium chips and associated soils and wastes and was continued through backfilling operations at T-1. Ambient air monitoring was performed to ensure that the potential radionuclide emissions from the T-1 Source Removal Project did not exceed the RFETS 10 millirem (mrem) per year public dose standard specified in Title 40 of the Code of Federal Regulations (CFR), Part 61, Subpart H, Section 61.92.

The project-specific ambient air monitoring for T-1 consisted of enhanced routine monitoring in the immediate vicinity of the T-1 project using the existing Radioactive Ambient Air Monitoring Program (RAAMP) network at the Site. To characterize the radionuclide emissions generated by activities conducted inside the temporary structure, three high-volume particulate air samplers were located near the activities with the greatest potential to release radionuclides into the atmosphere. Results of the ambient air measurements outside the T-1 tent structure are several orders of magnitude lower than inside the tent. This behavior suggests that the tent was very effective in attenuating air emissions from the project. Appendix B summarizes the result of the T-1 Air Monitoring Program, including supporting figures and graphs.

## 5.0 SITE RECLAMATION

This section addresses general site reclamation activities including the return of clean, previously excavated soil back to the trench, and placement of RFETS Investigation Derived Material (IDM) into the trench. This section also discusses the details associated with a five-gallon container encountered in the north wall of the trench excavation during the backfilling operations.

## 5.1 Disposition of RFETS IDM at T-1

DOE obtained EPA approvals for placement of drummed IDM (soil) into the T-1 excavation as backfill (see Appendix C). The IDM was generated during past remedial investigation drilling activities at RFETS. EPA approved IDM drums for return to T-1 based on an assessment of existing radionuclide and VOC data. The criteria used for drum acceptability for backfill disposition were that existing data be below RFCA Tier II action levels for radionuclides and Tier I action levels for VOCs. The IDM work at the Trench 1 site involved emptying and stockpiling the acceptable drums/contents inside the tent structure and then transferring the stockpiled material into the T-1 excavation.

Transfer of IDM drums from the 904 Yard/Tent 10 to the T-1 site began on October 23, 1998. The drums were secured on pallets on a flatbed trailer for transport. Stockpiling of the IDM soil within the Trench 1 tent structure began on November 3, 1998 and ended on December 15, 1998. The drums were typically emptied using a drum "tipper" mounted on forklift trucks. Periodic radiological surveys were performed on the IDM soil, drum liners and drums. Enhanced surveys were performed on IDM drums originating from the 903 Pad and East Trenches areas as directed by Radiological Engineering (i.e., surveys of the drum interior, drum contents, drum lids, and drum liners). All drums holding free-standing water were decanted at the 904 Decon Pad prior to transfer to the Trench 1 site.

A total of 1,434 IDM drums were emptied and the contents placed in the trench excavation following approval by EPA. The stockpiled IDM soil was transferred to the excavation on December 17, 1998 using a front loader. The IDM material was deposited on the excavation bottom six inches to as much as two feet deep (in low areas of the excavation) from the east extent of the excavation to approximately 175 feet from the east extent. The IDM has since been covered with soil from the T-1 clean soil (<5,000 cpm) stockpile. Appendix C contains a table which lists the IDM drums emptied at the Trench 1 site by the RFETS Waste Environmental Management System (WEMS) container number.

## 5.2 Discovery of Container During Backfill Operations at T-1

A five-gallon metal container was discovered in the T-1 excavation on December 18, 1998. The metal container was exposed by heavy equipment on the north wall of the trench excavation during backfill operations.

The newly discovered metal container was observed approximately 2.5 to 3 feet below ground surface in the north sidewall at approximately the 142-foot mark measured from the 0' marker stake at the west extent of the excavation (see Figure 4-1). The container appeared to be intact and undamaged when exposed. The metal container resembled similar five-gallon containers previously exhumed during the project and therefore potentially contained pyrophoric materials. Direct radioactivity measurements on the container indicated 55,182 cpm using a FIDLER. No removable radioactivity on the container exterior was observed. The area around the container was posted as a Radioactive Material Area.

Prior to removal of the metal container from the north excavation wall, an electromagnetic metal detection geophysical survey and a magnetic survey were performed above the known container location, as well as around the entire excavation perimeter. Results of the survey were used to evaluate if other containers were buried in the vicinity of T-1. The report documenting the results of the geophysical surveys is included as Appendix E. The effect of metallic objects in the structure and anchor bolt tie-downs of the T-1 tent base complicated data interpretation. Nonetheless, the surveys identified 13 individual buried metal objects in the vicinity of T-1, including the known, five-gallon container. Two of the anomalies were similar in size and shape to the known five-gallon container, and were part of an area identified as Zone C. Eight of the anomalies were considered to be small metal items buried at shallow depths. The remaining two anomalies were considered to be buried metal survey stakes.

The five-gallon container and the two items indicating similar anomalous geophysical readings were subsequently excavated. The five-gallon metal container contained historic sample bottles similar to what had been previously removed from the trench (see Section 3.4.2). The other items were a metal "No Smoking" sign and the lid of a small container. A Field Implementation Plan (RMRS, 1999b) was developed to address removal and characterization of the materials identified by the geophysical survey as likely to contain buried waste near T-1.

### 5.3 Return of Stockpiled T-1 Soil to the Excavation

In addition to the Clean Soil Stockpile (stockpile 1) confirmation sampling described in Section 4.2, EPA and CDPHE re-analyzed samples originally analyzed using gamma spectroscopy at the on-site laboratory. The agencies results confirmed the project gamma spectroscopy results. As a result, EPA granted approval to return the contents of the Clean Soil Stockpile to the excavation for use as backfill. Appendix C contains a letter from EPA to DOE approving the use of this soil as backfill material. Return of this soil for use as backfill was completed on March 4, 1999.

#### 5.4 Removal of the Tent Structure and Final Site Reclamation

Removal of the T-1 tent structure was conducted between March 29 and April 20, 1999. Radiological release of the heavy equipment and tent structure was performed in accordance with Operations Order, 00-T-1-15, *Release Evaluation Approach for T-1 Project*.

The Final reclamation of the site is expected to be completed in September, 1999. Reclamation will consist of application of approximately 2000 yd<sup>3</sup> of topsoil brought in from an offsite source. This will provide a cover of approximately 6" over the entire area disturbed by T-1 and the previous Mound Source Removal Project. A native grass seed mixture specified by the RFETS Ecology Group will then be applied using broadcast seeding methods. A commercially available hydro-mulch will also be applied per the manufactures specifications.

### 6.0 DISPOSITION OF SECONDARY WASTE STREAMS

This section details the characterization of the soils, DU and other wastestreams encountered during the excavation. These wastestreams were managed in a manner consistent with Rocky Flats policies and procedures and the requirements established by the PAM (RMRS, 1998a). The waste was originally stored in a Temporary Unit (TU) located adjacent to the T-1 weather structure. Prior to final disposition, much of the waste is planned to be moved to covered storage in another TU established within RCRA Unit 15B. This unit has been designated as Unit 2545.

A summary of the T-1 waste sample information is found in Appendix D. All waste being sent offsite for disposal will be considered CERCLA waste as the wastes were generated under a CERCLA response action, under the Rocky Flats Cleanup Agreement, and all but uncontaminated field trash is considered low level radioactive waste (LLW). Table 6-1 provides a summary of the T-1 Wastes. This table includes waste types, volumes generated, final and proposed disposition and references to supporting information.

The major wastestreams include:

- Radioactive metals (depleted uranium and other uranium/thorium wastestreams),
- Decanted lathe coolants,
- Cemented cyanide,
- Debris,
- Contaminated soil.

TABLE 6-1 T-1 SOURCE REMOVAL WASTE/MEDIA DISPOSITION

| Waste Type   | Regulatory Classifications   | Sample RIN | Packaging    | Container numbers (Note secondary overpacks if used are not listed)  | Interim Storage                       | Expected Disposition                            | Sampling: Analysis/Media                  | Volume                 |
|--|--|------------|--------------|--|---------------------------------------|---|---|------------------------|
| Soil<br>( $<5,000$ cpm, OVA $< 25$ ppm above background)                       | Not considered waste   | 98A2112    | not packaged | N.A.   | Stockpile 1                           | Returned to T-1                                 | Sampled per section 3.2.1 of the RMRS SAP | 1093.4 yd <sup>3</sup> |
| Soil<br>( $\geq 5,000$ but $\leq 10,000$ cpm, OVA $< 25$ ppm above background) | CERCLA Waste<br>LLM (F001, F002)<br>(LDR compliant)                    | 98A2113    | 21, B-88s    | X09698, X09699, X09700, X09702, X09703, X09704, X09705, X09706, X09707, X09708, X09709, X09710, X09711, X09718, X09719, X09720, X09721, X09722, X09723, X09724, X09725   | Stockpile 2 then transferred to B-88s | Envirocare                                      | Per Section 3.3.2 of the RMRS SAP         | 74.6 yd <sup>3</sup>   |
| Soil<br>( $>10,000$ cpm, OVA $< 25$ ppm above background)                      | CERCLA Waste<br>LLM (F001, F002)<br>(LDR compliant)                    | 98A2114    | 30, B-88s    | X09712, X09713, X09714, X09715, X09716, X09717, X09727, X09728, X09729, X09730, X09731, X09732, X09734, X09737, X09738, X09739, X09741, X09742, X09747, X09748, X09749, X09750, X09751, X09753, X09754, X09757, X09759, X09762, X09763, X09764 | T-1 Waste Container Staging Area      | Envirocare                                      | Per Section 3.3.2 of the RMRS SAP         | 106.5 yd <sup>3</sup>  |
| Soil<br>(OVA $\geq 25$ ppm above background)                                   | CERCLA Waste<br>LLM (F001, F002)                                       | 98A2116    | 10, B-88s    | X09761, X09752, X09758, X09746, X09755, X09756, X09745, X09743, X09744, X09735,  | RCRA Unit 15B                         | Treatment with T-1 DU or 10x LDR soil exclusion | Per Section 2.2.3 of the RMRS SAP         | 35.5 yd <sup>3</sup>   |
| Decanted Lathe Coolants  | CERCLA Waste<br>LLM (F001, F002)<br>Low PCBs                           | 98A2106    | 2, 55 gal    | X07938, X07927   | T-1 Waste Container Staging Area      | Treated on 1/19/99 at Building 891              | Per Section 3.3 of the STARMET SAP        | 110 gal                |
| Decanted Lathe Coolants  | CERCLA Waste<br>LLM (F001, F002)<br>PCB Remediation Waste (PCB Liquid) | 98A2106    | 1, 55 gal    | X07935   | RCRA Unit 15B                         | Treatment with T-1 DU                           | Per Section 3.3 of the STARMET SAP        | $<15$ gal              |



| Waste Type       | Regulatory Classifications  | Sample RIN | Packaging           | Container numbers (Note secondary overpacks if used are not listed)  | Interim Storage | Expected Disposition | Sampling: Analysis/Media           | Volume               |
|------------------|---|------------|---------------------|--|-----------------|----------------------|------------------------------------|----------------------|
| Depleted Uranium | CERCLA Waste<br>LLW<br>Hazardous Waste<br>(F001, F002, D006)<br>PCB Remediation waste | 98A2105    | See column at right | 78 - 55 gallon overpacks: D87702 D88413 D88407 D88417 D87699 D88425 D88387 D88388 D88418 D88414 D88410 D88415 D87710 D88405 D88416 D88412 D88419 D88420 D88406 D92869 D92857 D92858 D92864 D92860 D92861 D92859 D92865 D92868 D92863 D92862 D92854 D92855 D92870 D92853 D92871 D92866 D92852 D93262 D93269 D93264 D93274 D93270 D93271 D93276 D93266 D93282 D93260 D92856 D93259 D93261 D93263 D92867 D93273 D93265 D93275 D93268 D93281 D93272 D93267 D93278 D93279 D93283 D93285 D93277 D93287 D93286 D93288 D93284 D93280 D93462 D93450 D93457 D93461 D93466 D93469 D88411 (D87713 & D93473: both are sample returns) | RCRA Unit 15B   | DU Treatment Project | Per Section 3.2 of the STARMET SAP | 21.2 yd <sup>3</sup> |
|                  |   |            |                     | 47 - 83 gallon overpacks:<br>X09875 X09835 X09837 X09840 X09838 X09850 X09843 X09872 X09867X09868 X09865 X09877 X09841 X09869 X09870 X09894 X09871 X09866 X09845 X09844 X09880 X09874 X09860 X09862 X09884 X09878 X09883 X09853 X09855 X09879 X09887 X09882 X09881 X09854 X09876 X09857 X09886 X09888 X09885 X09864 X09863 X09851 X09893 X09856 X09890 X09842 X09839   |                 |                      |                                    | 19.3 yd <sup>3</sup> |
|                  |   |            |                     | 5 - 85 gallon overpacks:<br>X10374 X10371 X10398 X10375 X10372   |                 |                      |                                    | 2.1 yd <sup>3</sup>  |
|                  |   |            |                     | 1 - 110 gallon overpack: X10058  |                 |                      |                                    | 0.5 yd <sup>3</sup>  |
|                  |   |            |                     | 23 - B12s: X09834 X09833 X09805 X09822 X09821 X09798 X09801 X09809 X09810 X09800 X09804 X09799 X09803 X09806 X09826 X09807 X09828 X09827 X09808 X09830 X09831 X09825 X09824  |                 |                      |                                    | 37.6 yd <sup>3</sup> |

| Waste Type   | Regulatory Classifications  | Sample RIN  | Packaging              | Container numbers (Note secondary overpacks if used are not listed)  | Interim Storage                  | Expected Disposition                       | Sampling: Analysis/Media           | Volume                                       |
|--|---|-------------|------------------------|--|----------------------------------|--|------------------------------------|--|
| DU - Ingot ("Puck")  | AEC Source Material and CERCLA Waste, LLW   | not sampled | 55 gal                 | D93471   | RCRA Unit 15B                    | NTS  | not sampled                        | <0.5 ft <sup>3</sup>                         |
| Thorium waste  | CERCLA Waste LLM (F001, F002, D006) PCB Remediation waste                         | 98A2105     | 1, 83 gal<br>1, B-12   | X09852 (overpack X11067, IDC 374)<br>X09823 (IDC 374)  | RCRA Unit 15B                    | DU Treatment Project                       | Per Section 3.2 of the STARMET SAP | 0.27 yd <sup>3</sup><br>1.6 yd <sup>3</sup>  |
| HISTORIC SAMPLES UH <sub>3</sub> (Natural uranium) and "TU" (assumed DU tuballoy)<br>Note: some of the UH <sub>3</sub> probably contains tritium | CERCLA Waste LLM (F001, F002, D006) PCB Remediation waste                         | 98A2105     | 1, B-12<br>2, 55 gal   | X09829 (IDC 374)<br>D93476 (separated because tritium concern)<br>D93468 (contains DU and natural U)   | RCRA Unit 15B                    | DU Treatment Project                       | Per Section 3.2 of the STARMET SAP | 2.1 yd <sup>3</sup>                          |
| Cemented Cyanide   | CERCLA Waste LLM (F006, F008, D006) Asbestos Containing Material                  | 98A2109     | 10, 55 gal<br>1 83 gal | IDC 823:<br>X10401 X10397 X10390 X10399 X10373<br>X10377 X10376 X10393<br>X10388 X10382<br>IDC 325: X09903 (drum lids, rings, sample equip, PPE used in CN tasks)  | RCRA Unit 15B                    | Cemented Cyanide Treatment Project         | Per Section 3.5 of the STARMET SAP | 2.7 yd <sup>3</sup><br>0.4 yd <sup>3</sup>   |
| Debris   | CERCLA Waste LLM debris waste (F001, F002) (LDR compliant) PCB Bulk Product waste | 98A2117     | 5, B-88s<br>1, 55 gal  | B-88s:<br>X09736 (sampled), X09733, X09760,<br>X09701, X09726 (soil in this box sampled under RIN 98A2116)<br>D87711 (contains pumps, hoses, piping PPE potentially contaminated with T-1 spent lathe coolant) | T-1 Waste Container Staging Area | Envirocare                                 | Per Section 3.4 of the RMRS SAP    | 17.8 yd <sup>3</sup><br>0.27 yd <sup>3</sup> |
| Project Generated Debris   | CERCLA Waste LLW  | Not Sampled | 1, B-88<br>4, B-12s    | B-88: X09740<br>B-12s: X09832, X09795, X09796, X09797  | T-1 Waste Container Staging Area | NTS  | Not sampled                        | 3.6 yd <sup>3</sup><br>6.4 yd <sup>3</sup>   |
| PPE Waste  | CERCLA Waste LLW  | Not Sampled | 1, B-12<br>5, B-88s    | B-12: X09794<br>B-88s: X09695, X09696, X09697, X11519, X11520  | T-1 Waste Container Staging Area | B-12 NTS<br>B-88: shipped to NTS on 2/3/99 | Sampling not required              | 19.4 yd <sup>3</sup>                         |

## 6.1 Radioactive Metals

Most of the radioactive metals removed from T-1 were depleted uranium. Project personnel determined the uranium type and the potential presence of transuranic isotopes using gamma spectroscopy, throughout the project. No wastestreams containing enriched uranium or transuranic isotopes (other than at low, near detection level concentrations) were detected during the T-1 project. The following subsections address both the radiological and chemical characterization of the radioactive metals.

### 6.1.1 Depleted Uranium

The main DU wastestream has been packaged in 153 containers, both overpack drums and B-12 waste packages as indicated by Table 6-1. Characterization data collected during the excavation phase indicated that there was widespread contamination of the DU with chlorinated volatile organic compounds, polychlorinated biphenyls (PCBs) as well as cadmium. The primary chlorinated VOCs were tetrachloroethene (PCE) and trichloroethene (TCE), and the only PCB detected was Aroclor-1254.

The widespread organic contamination was not anticipated prior to excavation activities. The sampling strategy developed to support the characterization of the DU was based on field segregation of material by physical characteristics or distinct geographic locations, if possible, within the trench (Starmet, 1998). Efforts would then focus on characterization by lot within the DU wastestream. The sampling and analysis plan was not intended to address full characterization of individual drums or waste packages. Segregatable differences in physical characteristics and geographic locations were not apparent during excavation. Since not all drums were sampled for all possible constituents and breakout of DU using field segregation was not possible, breakout of DU by an identifiable lot was also not possible.

The analytical approach given in the SAP was to perform a gamma spectroscopy analysis on every container (overpack drum or B-12 waste box) and metals, VOCs and SVOCs on every fifth container filled. As the first drums of DU were removed it became apparent that VOC contamination existed. As such, the VOC analysis was immediately increased from every fifth to every container. After approximately one third of the containers were sampled, oily material was observed on samples of DU. This material was analyzed for PCBs which were subsequently confirmed present. At this point it was decided to analyze samples for PCBs from all new drums

being removed from T-1 as well as on some of the samples previously submitted to the laboratory. PCBs were detected in most of the samples at widely varying concentrations. Relatively high levels of metals were detected in some of the drums. It was decided that if total metal concentrations could exceed the TCLP thresholds, then the laboratory would perform TCLP metals on the affected samples. Of the approximately thirty-one waste containers sampled for metals, six drums exceeded the TCLP thresholds for cadmium. There was no apparent relationship of the cadmium concentration variability with any other characteristic of the waste.

Extreme variability in chlorinated VOC, PCB and cadmium concentrations in DU samples has major waste management and disposal consequences. It seems reasonable to assume that much of the variability of the organic contaminants is attributable to the amount of "oil residue" that was present in some of the DU material being sampled, and that the amount of residue may be variable within an individual drum. Therefore, it would be difficult to accurately determine VOC and PCB concentration levels in a drum based on one sample, from the drum. Therefore, the entire chips and turnings based DU wastestream was characterized as a lot, not on an individual drum by drum basis. The following characterization is a result of the lot based characterization approach.

The DU wastestream is considered contaminated with chlorinated volatile organic compounds that are typically considered F001 and F002 solvents based on historic use at Rocky Flats. In addition, the waste code D006 has been applied because approximately 20% of the drums sampled exceed the TCLP thresholds for cadmium. Finally, the waste is considered a bulk PCB remediation waste under the Toxic Substances Control Act (TSCA).

This wastestream will require treatment prior to disposal. Final treatment must address treatment of the RCRA underlying hazardous constituents (UHCs) reasonably expected in the waste. This must include numerous semivolatile organic compounds (SVOCs), PCBs addressed as UHCs, and any other constituents reasonably expected in the waste stream. Sample results for this wastestream are contained in RIN 98A2105.

There is one exception to the overall DU chemical characterization. A DU ingot or "puck" was uncovered during the excavation. This material was solid and did not appear to have been machined. This material was placed in a 55-gallon drum (D93471), inerted or packed with clean soil. The volume of the DU puck is less than 0.5ft<sup>3</sup>. This material was not sampled because the

material was positively identified by one of the project RCTs familiar with the process of manufacturing DU ingots or "pucks". In addition, sampling solid DU would have been extremely challenging. Because of its massive nature this waste is not considered pyrophoric, and is not considered a hazardous waste or PCB waste, because it has not been machined, so contamination is unlikely. Also cadmium presence is unlikely as the ingot was not a finished product and did not appear to have been plated; a probable source of the cadmium contamination. The ingot is considered source material under the Atomic Energy Act and low level radioactive waste.

On several instances Am-241 was detected in DU samples submitted for gamma spectroscopy analysis. The analysts providing gamma spectroscopy services were not convinced that the material that they were identifying as Am-241, was in fact that isotope. They observed evidence of the characteristic X-rays of tungsten, which, if present could interfere with their ability to quantify Am-241. Data was reported as Am-241, however letters accompanying the data submittal indicated their uncertainty. Using a combination of X-ray fluorescence to identify tungsten and radiochemical analysis of Am and Pu isotopes, the potential presence of significant Am-241 (e.g., anything more than background level contamination) was eliminated. A sample composited from five DU samples did show the presence of Pu-239/240, though at a relatively low 16 pCi/g.

A more complete description of the gamma spectroscopy Am-241/tungsten anomalies is contained in the Gamma Spectroscopy data packages for RIN 98A2105.

Two drums (D87713 & D93473) contain T-1 DU and soil sample returns that were returned after analysis from onsite laboratories. Plastic sample jar lids were removed (part of debris wastestream) and the samples placed into one of two 55 gallon drums. If the sample could not be removed from the glass jar, the sample was broken open in the drum, therefore the drums contain glass shards in addition to the DU and soil. The DU was inerted with the returned soil samples and additional clean soil, as required. Both drums also contain some "historic samples" described in Section 6.1.3.

Radioactive metals other than DU are described in the following two subsections.

### 6.1.2 Thorium

Through the use of gamma spectroscopy it was determined that some of the radioactive material removed from T-1 was not DU or DU contaminated. Two samples (a regular and duplicate) used to characterize a drum of radioactive material placed into an 83-gallon overpack indicated that the drum was contaminated by Thorium-232 (Th-232) through identification of its daughter products including Actinium-228 (Ac-228). The samples 98A2105-023 and 98A2105-024 were used to characterize this drum (X09852). Considering that the material is approximately 40 years old, the activity detected for Actinium-228 would approximate that of the Th-232 parent material. This would be approximately 20,000 pCi/g Th-232 for the material in drum X09852. The relationship between Ac-228 and Th-232 was confirmed using the computer software RADDECAY (Grove engineering, 1987).

A B-12 (X09823) also contains Th-232 waste and unlike the drum described above contains DU as well. The in-process checklist used during the box filling indicates that the B-12 probably contains the contents of two non-intact drums and soil. The sample log clearly indicates that two distinct materials made up the sample from the B-12 (Sample number 98A2105-040) and the results confirm both the presence of thorium and DU. As a result, it is reasonable to assume that the B-12 contains both a thorium (Th-232) and a DU wastestream.

The thorium waste is also contaminated with PCE, TCE and PCBs similar to that of the DU. Significant cadmium was not detected in the drum (X09852) but was not sampled for in the B-12 (X09823). Since this information is absent but possible, it is assumed that the waste contains cadmium and will be coded as D006 as well.

### 6.1.3 Natural Uranium

A B-12 waste box (X09829) contains the contents of old "historic" sample bottles described in Section 3.4.2. As the section indicates the sample jars make up a very small proportion of the contents of the B-12, with the remaining volume containing soil. The sample jars contain both natural and what is assumed to be DU (the "tuballoy" sample). No samples were collected from the jar identified as containing tuballoy since this material was assumed to be DU. The samples collected from the other original (historic) sample bottles are 98A2105-187, 203, 204, 207. These samples contained PCE, however no PCBs or cadmium above TCLP thresholds was detected. As noted above, the tuballoy itself was not sampled, and therefore the absence of PCBs

or cadmium cannot be eliminated. Therefore, the same chemical characterization used for the DU has been applied. Two drums containing general T-1 sample returns (D87713 & D93473) also contain the returned "historic samples" described above.

Additional historic sample bottles were contained in the 5-gallon "pail" that was encountered during backfilling operations in December, 1998. A total of 5 historic sample jars were contained in the pail. Three of the five sample bottles were placed into one 55 gallon drum (D93468). One sample (99A5024-001) was collected from a historic sample jar which had little identification information on it. The other two sample jars indicated U-238 (probably DU) and were not sampled. The result indicated the sampled material had isotopic ratios similar to natural uranium. Therefore, container D93468 is assumed to have both natural and DU material in it.

The two remaining historic sample jars had identification markings indicating that the material was uranium hydride: "UH<sub>3</sub> den" and "UH<sub>3</sub>•2(HO)" (probably UH<sub>3</sub>•2(H<sub>2</sub>O) but the label was defaced). Both samples were analyzed by gamma spectroscopy in their original sample jars (overpacked in new, double plastic bags). The results were consistent with "natural uranium" using the isotopic uranium ratios and the tolerances established by the project. After analysis, these samples were placed in a 55 gallon drum (D93476), covered with inerting soil and broken open to inert in the soil.

After the second jar (UH<sub>3</sub>) was broken open, an alarm sounded from a tritium monitoring instrument used to monitor the evolution. As discussed in Section 3.4.2, tritium was likely to have been a component of the uranium hydride. The total concentration (activity) of tritium present in the material has not been determined. Tritium should be evaluated prior to treatment of this material. As a precaution, all radioactive metal waste described as containing "natural uranium" should be handled as though it contains tritium unless tritium can be eliminated through direct analysis.

## 6.2 Decanted Lathe Coolants

What appeared to be lathe coolant was decanted from a number of intact drums removed from the trench. The lathe coolant was segregated in accordance with the Starmet SAP. Two 55-gallon drums were filled with what appeared to be an aqueous phase liquid (X07938, X07927), while one drum (X07935) was filled with an organic phase liquid. Analytical results confirmed the presence of chlorinated VOCs and PCBs in the lathe coolant, while significant levels of inorganic contaminants (metals) were not detected. Because of the presence of PCE, TCE and

PCBs, this wastestream was considered to be an F001, F002 hazardous waste and also a TSCA PCB Remediation Waste (PCB liquid), for offsite waste disposition purposes.

Samples analyzed at the Rocky Flats 559 Laboratory showed elevated plutonium results using the laboratories gram per liter (g/L) procedure. No Americium-241 (Pu-241 progeny) was detected from collocated samples analyzed by gamma spectroscopy; indicating questionable g/L Pu results. After consultation with the 559 laboratory it was determined that the g/L procedure does not separate Pu and U. Hence, elevated U levels would likely cause artificially high levels of Pu to be reported, as was most likely the case. Considering this, and the fact that the Pu-241 progeny was not detected by gamma spectroscopy, the presence of Pu in the lathe coolant was ruled out. The samples used to characterize the decanted lathe coolant are contained in RIN 98A2106. Appendix D lists the analytical results and supporting information used to characterize the lathe coolant.

On January 19, 1999 the two drums containing aqueous phase liquids were treated at the Rocky Flats Consolidated Water Treatment Facility (CWTF). Treatment alternatives are currently being evaluated for Drum X07935 which contained the organic phase liquid. It is possible that the contents of this drum may be treated with the DU wastestream.

### 6.3 Cemented Cyanide

Ten 55-gallon drums of unsolidified cemented cyanide waste were exhumed from the trench. Several issues existed regarding the classification of this waste. Appendix D includes a letter formalizing a change in classification from what was originally assumed in the PAM.

Samples were collected from each of the ten drums for gamma spectroscopy and total cyanide analysis. All results indicated low level uranium contamination and significant levels of cyanide (0.51 - 5.3 weight %). Most of the drums appeared to contain asbestos fibers; samples from two drums were analyzed for asbestos and both contained significant asbestos (15 and 25% by volume). Four samples were collected from three of the drums (this included one duplicate) and were analyzed for VOCs/SVOCs, the full TCLP list, reactive sulfide, reactive cyanide, corrosivity, and isotopic Pu, Am, U, as well as additional gamma spectroscopy. These four samples appeared to be representative of the entire wastestream. A summary of the analytical results follows:



- No VOCs or SVOCs were detected,
- All samples exceeded TCLP thresholds for cadmium (829-1,200 mg/L),
- No other TCLP thresholds were exceeded,
- pH was in the range of 12.4-13.2,
- Reactive Sulfide was undetected,
- Reactive Cyanide: Three of four samples reported as undetected. One sample reported as 0.3 mg/kg reactive cyanide.

The original, complete data set collected to characterize this waste can be found in the K-H Analytical Services Division vault under report Identification Number (RIN) 98A2109. Table 6-2 contains summaries of the analytical results. Additional analysis (amenable cyanide and total metals) is planned to be performed on the previously collected cemented cyanide samples. This will be done to support future treatment and waste handling issues associated with this waste. The results will be filed under RIN 99A7405 following analysis.

As the PAM states, the original cyanide generation process could not be established with full confidence. As a result, it was originally planned to rely on the waste characteristics to determine if it was hazardous waste or not. After a more thorough evaluation (see Appendix D) the generation process was essentially determined to be a listed electroplating process. The applicable listings are F006 and F008 and are defined as "Wastewater treatment sludges from electroplating operations...", and "Plating bath residues from the bottom of plating baths from electroplating operations where cyanides are used in the process", respectively. Though there are no Land Disposal Restriction (LDR) implications, the waste code D006 is also being added to the cemented cyanides. This was not addressed in the reclassification letter described above but is appropriate as the waste exceeds the TCLP standard for cadmium.

TABLE 6-2 SUMMARY OF CEMENTED CYANIDE ANALYTICAL RESULTS

|                                   |        |  | All Radionuclides in pCi/g <sup>1</sup> |        |      |         |                 |            |                      |      |                |      |       |  |  |  |  |  |  |  |
|-----------------------------------|--------|--|---|--------|------|---------|-----------------|------------|----------------------|------|----------------|------|-------|--|--|--|--|--|--|--|
|                                   |        |  | U-235/238                               |        |      |         | Total           |            | Reactive             |      |                |      |       |  |  |  |  |  |  |  |
|                                   |        |  | Mass Ratio                              |        | TCLP |         | Cyanide         |            | Cyanide <sup>2</sup> |      | Asbestos       |      |       |  |  |  |  |  |  |  |
|                                   |        |  | U-238                                   | U-235  | (%)  | Am-241  | Exceedence      | (weight %) | (ppm)                | pH   | (vol %)        | VOCs | SVOCs |  |  |  |  |  |  |  |
| 98A2109-001                       | X10401 | Top layer is white/grey/yellow. Bottom layer is grey/green + slightly red/brown. Pasty w/ fibers | 47.9                                    | 1.14   | 0.37 | 0.0735U | Cd @ 829 mg/l   | 2.13       | 0.3                  | 12.4 | 25             | ND   | ND    |  |  |  |  |  |  |  |
| 98A2109-003                       | X10397 | Tan damp material, no liquid present   | 55.2                                    | 1.62   | 0.46 | 0.0903U | Cd @ 1,040 mg/l | 1.85       | ND                   | 12.9 | 15             | ND   | ND    |  |  |  |  |  |  |  |
| 98A2109-004<br>(duplicate of 003) | X10397 | Tan damp material, no liquid present   | 55.8                                    | 1.91   | 0.53 | 0.0692U | Cd @ 1,200 mg/l | 3.39       | ND                   | 13.2 | Fibers Visible | ND   | ND    |  |  |  |  |  |  |  |
| 98A2109-006                       | X10390 | Off-white material/light gray at depth. Liquid present.  | 130.0                                   | 4.95   | 0.59 | 0.0236U | Cd @ 972 mg/l   | 2.25       | ND                   | 12.8 | Fibers Visible | ND   | ND    |  |  |  |  |  |  |  |
| 98A2109-008                       | X10399 | Off-white material. No liquid present. Pasty with fibers   | 16.0                                    | 0.71   | 0.69 | 4.53U   | Not tested      | 2.30       |                      |      | Fibers Visible |      |       |  |  |  |  |  |  |  |
| 98A2109-009                       | X10373 | Off-white matl w/ brown liquid present on surface. Saturated paste. pH = 13                      | 21.6                                    | 1.09   | 0.78 | 4.61U   | Not tested      | 2.40       |                      |      | Fibers Visible |      |       |  |  |  |  |  |  |  |
| 98A2109-010                       | X10377 | Hard brown/gray material. Wet pastes below surface.  | 59.9                                    | 0.986U | 0.00 | 5.92U   | Not tested      | 5.30       |                      |      | Fibers Visible |      |       |  |  |  |  |  |  |  |
| 98A2109-011                       | X10376 | Tan wet paste. Liq on surface & in material. pH=13.  | 40.6                                    | 1.31   | 0.50 | 1.26U   | Not tested      | 2.80       |                      |      | Fibers Visible |      |       |  |  |  |  |  |  |  |
| 98A2109-012                       | X10393 | Hard tan material, greenish colored below surface.   | 8.1                                     | 0.193U | 0.00 | 1.26U   | Not tested      | 2.00       |                      |      |                |      |       |  |  |  |  |  |  |  |
| 98A2109-013                       | X10388 | Dark green to off-white hard materials   | 26.4                                    | 0.944  | 0.56 | 1.18U   | Not tested      | 0.54       |                      |      | Fibers Visible |      |       |  |  |  |  |  |  |  |
| 98A2109-014                       | X10382 | Light tan/off-white wet paste  | 81.8                                    | 2.38   | 0.45 | 1.95U   | Not tested      | 0.51       |                      |      | Fibers Visible |      |       |  |  |  |  |  |  |  |

U = Detection Limit

<sup>1</sup>Radionuclide data are a result of radiochemical analysis for samples 98A2109-001 through -006 and gamma spectroscopy analysis for samples 98A2109-008 through -014.

<sup>2</sup>Samples 98A2109-001, 004, 006, and 010 will be submitted for amenable cyanide analysis (i.e., amenable to chlorination) and total metals to support future treatment options. Results are expected in July 1999.

#### 6.4 Excavated Debris

Other than drum carcasses very little debris was encountered during the T-1 excavation. Deteriorated drum carcasses (fragments), drum lids and rings were typically removed as practical and visually verified free of chips or turnings so that they would be considered non-pyrophoric, and free liquids (i.e., oils). This material was then placed in B-88 type waste boxes. The other types of debris encountered included a few pieces of pipe, a small volume (<1ft<sup>3</sup>) of some type of sandpaper and cardboard containers identified as "ice cream cartons" in the field. These cardboard containers were apparently used to hold DU floor sweepings from Building 444. Since very little debris was encountered, few samples were collected. One full chemical and radiological suite sample was collected, along with two additional gamma spectroscopy samples. All samples showed evidence of DU contamination. The full suite sample was collected from the cardboard "ice cream cartons". The sample contained PCE at 23 ug/kg, (F001, F002 but below the current LDR levels), PCB (Aroclor-1254) at 730,000 ug/kg, and various RCRA metals including cadmium, all well below the TCLP thresholds. As such, the waste is considered an LDR compliant mixed hazardous waste with the following RCRA codes, F001 and F002. In addition, the waste is considered a mixed PCB Remediation waste under TSCA. Since much of the debris is rusty metal fragments, it may not be practical to use the RCRA debris standard to exit the RCRA hazardous waste regulations.

The sample of the cardboard "ice cream cartons" is probably a "worst case" sample as it contained DU, was very porous, and hence was able to absorb contaminants better than the typical metal drum fragment. All debris sample results are contained in the project files for RIN 98A2117.

#### 6.5 Project Generated Debris

Several waste boxes of crated debris contain material that was not removed from the excavation. Specifically, boxes X09740, X09832, X09795 and X09796 contain items like PPE, plastic liners, empty 1 gal paint cans (used to transport T-1 samples), various metal and wood components used within the tent structure. In addition, the boxes contain a mineral oil pump, PM-10's air monitors with motor assemblies, air filters from the heavy equipment, wooden handles from shovels and HEPA cartridges from full face respirators, etc. These materials are considered by project waste generation personnel to be CERCLA and LLW only, as they are not contaminated by RCRA or TSCA constituents. Samples were not collected of this debris, but the debris is consistent with

typical materials used in radiologically controlled areas that cannot be economically free released because of the potential for low level radionuclide contamination in inaccessible or difficult to survey areas.

## 6.6 Soil

Soil not returned to T-1 was segregated using radiological and VOC field screening techniques into the categories described in Section 3.1. Analytical results from ten B-88s containing soil with OVA readings at > 25 ppm contained chlorinated VOCs (primarily PCE and TCE) at concentrations up to 51 mg/kg, and Aroclor-1254 up to 16 mg/kg. As such, the waste is considered a non-LDR compliant mixed hazardous waste with RCRA codes F001 and F002. Because all measured PCB concentrations are below 50 ppm this wastestream is not regulated under TSCA. This material is considered one lot, and will require treatment prior to disposal, to address the F001 and F002 constituents. The data used in this analysis is contained under RIN 98A2116. Table 6-3 provides summary analytical information for soils that were screened to contain > 25 ppm on the field OVA.

Twelve gamma spectroscopy and four full suite chemical samples were collected from fifty-one B-88s containing soil with OVA reading at < 25 ppm. This wastestream was originally anticipated to be LLW, suitable for disposal at NTS. However, one sample from this lot of B-88s contained a positive detection of PCE at 24 ug/kg, and Aroclor-1254 (a PCB) at 650 ug/kg. Because of the PCE contamination, the waste is considered an LDR compliant mixed hazardous waste with RCRA codes F001 and F002. This material is considered one lot, and will not require treatment prior to disposal. The data used in this analysis is contained under RINs 98A2113 and 98A2114. Table 6-4 provides summary analytical information for soils that were screened to contain < 25 ppm on the field OVA.

TABLE 6-3 SUMMARY OF ANALYTICAL RESULTS FOR SOILS CONTAINING > 25 PPM ON THE FIELD OVA

| RIN         | Container           | Container Type | All Rad in pCi/g |       | mass ratio | All Chemicals in mg/kg |         |         |          |
|-------------|---------------------|----------------|------------------|-------|------------|------------------------|---------|---------|----------|
|             |                     |                | U-238            | U-235 |            | AM-241                 | PCE     | TCE     | PCB-1254 |
| 98A2116-001 | X09761              | B-88           | 334.00           | 3.53  | 0.16       | ND                     | 0.84 B  | 0.045 J | 0.97     |
| 98A2116-002 | X09752              | B-88           | 1,300.00         | 7.36  | 0.09       | ND                     | 0.32    | ND      | 1.1      |
| 98A2116-003 | X09758              | B-88           | 708.00           | 4.23  | 0.09       | ND                     | 0.46    | ND      | 2.5      |
| 98A2116-004 | X09746              | B-88           | 796.00           | 14.00 | 0.27       | ND                     | 0.42    | ND      | 1.8      |
| 98A2116-005 | X09755              | B-88           | 245.00           | 0.00  | 0.00       | ND                     | 0.27    | ND      | 0.19     |
| 98A2116-006 | X09756              | B-88           | 1,470.00         | 18.50 | 0.20       | ND                     | 0.82    | ND      | 1.6      |
| 98A2116-007 | X09745              | B-88           | 466.00           | 4.53  | 0.15       | ND                     | 0.47    | ND      | 1.3      |
| 98A2116-008 | X09743              | B-88           | 92.40            | 0.00  | 0.00       | ND                     | 0.067 J | ND      | 0.45     |
| 98A2116-009 | X09743              | B-88           | 148.10           | 2.45  | 0.26       | ND                     | 0.140 J | ND      | 9.5 D    |
| 98A2116-010 | X09744              | B-88           | 3,980.00         | 45.10 | 0.18       | ND                     | 51 D    | 0.130 J | 16 D     |
| 98A2116-011 | X09735              | B-88           | 230.00           | 5.27  | 0.36       | ND                     | 0.63 B  | ND      | ND       |
| 98A2116-012 | X09726 <sup>1</sup> | B-88           | 137.00           | 1.28  | 0.15       | ND                     | 0.73 B  | ND      | 0.53     |

Notes:

<sup>1</sup>Container X09726, was originally sampled as soil. However, this container was subsequently filled with debris and as such is considered a debris wastestream.

B = detected in blank

J = result below instrument detection limit, estimated value

ND = not detected

TICs = Tentatively Identified Compounds

TABLE 6-4 SUMMARY OF ANALYTICAL RESULTS FOR SOILS CONTAINING < 25 PPM ON THE FIELD OVA

| Soil > 10,000 cpm       |          |                | Gamma Spectroscopy |       |       | Radiochemical |         |        | TCLP (mg/L) |       |         |                     |                    |                                |             |             |             |        | Reactivities (mg/kg) |         |      |
|-------------------------|----------|----------------|--------------------|-------|-------|---------------|---------|--------|-------------|-------|---------|---------------------|--------------------|--------------------------------|-------------|-------------|-------------|--------|----------------------|---------|------|
| RIN                     | Location | Container Type | (pCi/g)            | U-238 | U-235 | mass ratio    | (pCi/g) | Pu-239 | PCE         | TCE   | xylenes | Total SVOCs (ug/kg) | Total PCBs (ug/kg) | VOCs                           | SVOCs       | pesticides  | herbicides  | metals | Cn-                  | Sulfide | pH   |
| 98A2114-001             | X09759   | B-88           | 670.00             | 3.91  |       | 0.09          | 0.13    | 1.39   | 24.0        | 6 U   | 6 U     | low SVOCs           | 650                | 0.048 mg/L PCE, 0.017 mg/L TCE | non-detects | non-detects | non-detects | < TCLP | 0.50 U               | 60      | 8.3  |
| 98A2114-003             | X09741   | B-88           | 1,250.00           | 6.51  |       | 0.08          |         |        |             |       |         |                     |                    |                                |             |             |             |        |                      |         |      |
| 98A2114-004             | X09714   | B-88           | 509.00             | 9.45  |       | 0.29          |         |        |             |       |         |                     |                    |                                |             |             |             |        |                      |         |      |
| 98A2114-005             | X09737   | B-88           | 306.00             | 1.90  |       | 0.10          |         |        |             |       |         |                     |                    |                                |             |             |             |        |                      |         |      |
| 98A2114-006             | X09716   | B-88           | 547.00             | 10.90 |       | 0.31          | 0.29    | 2.74   | 1.1U        | 1.1 U | 2.2 U   | low TICs            | not analyzed       | carbon tet 0.0562*             | non-detects | non-detects | non-detects | < TCLP | -0.0388 U            | 5.39 J  | 7.84 |
| 98A2114-008             | X09718   | B-88           | 70.50              | 1.85  |       | 0.41          | 0.53    | 0.14   | 1.2 U       | 1.2 U | 2.0 J   | low TICs            | not analyzed       | carbon tet 0.0469*             | non-detects | non-detects | non-detects | < TCLP | -0.0336 U            | 0.173 J | 8.35 |
| Soil 5,000 - 10,000 cpm |          |                |                    |       |       |               |         |        |             |       |         |                     |                    |                                |             |             |             |        |                      |         |      |
| 98A2113-001             | TR00698  | stockpile      | 782.00             | 8.02  |       | 0.16          |         |        |             |       |         |                     |                    |                                |             |             |             |        |                      |         |      |
| 98A2113-002             | TR01598  | stockpile      | 600.06             | 4.80  |       | 0.12          |         |        |             |       |         |                     |                    |                                |             |             |             |        |                      |         |      |
| 98A2113-003             | TR02098  | stockpile      | 43.42              | 0.63  |       | 0.23          |         |        |             |       |         |                     |                    |                                |             |             |             |        |                      |         |      |
| 98A2113-004             | TR02098  | stockpile      | 31.59              | 0.62  |       | 0.30          |         |        |             |       |         |                     |                    |                                |             |             |             |        |                      |         |      |
| 98A2113-005             | TR02998  | stockpile      | 24.80              | 0.73  |       | 0.46          |         |        |             |       |         |                     |                    |                                |             |             |             |        |                      |         |      |
| 98A2113-006             | X09722   | B-88           | 170.00             | 2.36  |       | 0.22          | 0.31    | 1.03   | 1.1 U       | 1.1 U | 2.2 U   | low TICs            | not analyzed       | carbon tet 0.0417 J*           | non-detects | non-detects | non-detects | < TCLP | -0.0264 U            | 0.472 J | 8.04 |

Notes

B = detected in blank

U = detection limit

J = result below instrument detection limit, estimated value

TICs = Tentatively Identified Compounds

\*In samples 98A2114-006, 008 and 98A2113-006, carbon tetrachloride was detected in the TCLP leachate. However, this compound was also detected in the corresponding TCLP blanks at approximately the same concentration and was not detected in the collocated samples analyzed for total VOCs. Therefore, this contaminant can only be considered a result of internal laboratory contamination, and is not reflective of the waste.

## 7.0 DATA QUALITY ASSESSMENT

Data used in making management decisions for waste management remedial actions must be of adequate quality to support the decisions. Adequate data quality for decision-making is required by applicable RMRS and K-H corporate policies (RMRS, 1998d, §6.4 and K-H, 1997, §7.1.4 and 7.2.2), as well as by the customer (DOE Order 5700.6C). Regulators and the public also expect decisions and data that are technically and legally defensible. Verification and validation of the data ensure that data used in designing the project, which address both environmental risk and potential waste liabilities, are usable and defensible.

Data quality objectives of the project were achieved based on the Data Quality Assessment (DQA) provided herein, which includes details of the Verification and Validation performed on the project data. A summary of the DQOs and the corresponding decisions is given in Table 7-1.

Details on the data validation, relative to data qualifications and completeness of the process, are given in Section 7.3.

Real-time decisions made in the field during remediation of the trench were based on "Form-1" data (unvalidated laboratory results sheets) faxed directly from the lab(s). Thorough data validation could only be performed after data were collected into packages and submitted to the data validator. Fundamental aspects of data verification critical to real-time decisions, such as sample traceability, were performed in the field by the sample manager.

### 7.1 Verification of Results

Verification ensures that data produced and used by the project are documented and traceable per quality requirements. Generally, verification consists of reviewing the data to determine whether

- ◆ Chain-of-Custody was intact from initial sampling through transport and final analysis;
- ◆ preservation and hold-times were within tolerance;
- ◆ selected samples underwent analysis at Utah Certified labs (for WAC compliance), as appropriate; and
- ◆ format and content of the data is clearly presented relative to goals of the project.

TABLE 7-1 TRENCH 1 SUMMARY OF SAMPLE TYPES & DQOs

| Sample Type                                   | DQA, V&V completed    | DQO  | Decision  |
|---|-----------------------|--|---|
| final excavation surfaces (floor & sidewalls) | Yes                   | verify that cleanup target levels stated in the associated PAM were met  | Excavation surfaces are below regulatory thresholds (PAM); excavation and backfill completed  |
| depleted Uranium                              | Yes                   | determine types of radioactive materials and quantities, as well as any hazardous constituents that would constitute mixed waste streams for suitable treatment/recycling design | Results confirm majority DU, but also helped segregate thorium and natural uranium; waste is also CERCLA LLM (VOCs, Metals) & TSCA (PCBs); waste destined for treatment (TBD) |
| Stockpile (<5k cpm)                           | Yes                   | confirm acceptable levels of COCs for returning soil to excavation, complementary to field monitoring  | soil contaminants below applicable RFCA action levels (soil was used as backfill)   |
| Stockpile (5k - 10k cpm)                      | Yes (partial)         | determine whether soil is eligible for return to trench, per types & quantities of COCs present  | stockpile contaminated (CERCLA, LLM); packaged for offsite shipment (see Table 6-1)   |
| Stockpile (>10k cpm); organic vapor < 25ppm   | Yes (partial)         | determine types of rad/haz materials and quantities for suitable treatment/disposal options  | packaged for offsite disposition (CERCLA, LLM)  |
| liquid wastes                                 | Yes (gamma spec only) | verify that liquid waste can be treated at the onsite CWTF   | some liquid waste accepted by CWTF; remainder to be treated w/ depleted U   |
| VOC contaminated soils; organic vapor >25ppm  | Verified only         | determine types of rad/haz materials and quantities for suitable treatment/disposal options  | CERCLA, LLM; (see Table 6-1)  |
| debris (from excavation)                      | Yes (partial)         | determine types of rad/haz materials and quantities for suitable treatment/disposal options  | CERCLA, LLM; PCB Bulk Product Waste   |
| geotechnical                                  | Not Required          | comply with minimal WAC requirements @ TSDf (Envirocare)   | WAC Compliance established  |
| isotopic (actinides)                          | Yes                   | verify gamma-spec method relative to actinide types/quantities   | Gamma-spec results are acceptable   |
| cemented cyanide                              | Pending               | To determine types of rad/haz materials and quantities.  | CERCLA, LLM; Asbestos Containing Material   |
| tritium                                       | Yes                   | To determine presence/absence of tritium   | Tritium present, probable in some material  |



In addition to the criteria noted above, verification of the T-1 data also included additional checks sometimes acknowledged as within the "validation" category, depending on the type of analysis:

- ◆ surrogate recovery
- ◆ MS/MSD recovery
- ◆ calibrations
- ◆ blanks
- ◆ sample preparations
- ◆ other QC

For an integrated evaluation of the data quality, results of the verification are collectively discussed with validation in Section 7.3.

## 7.2 Validation

Validation consists of a technical review of the data, or portion of the data, so that any limitations of the data relative to project goals are defined, and the associated data are qualified (caveated) accordingly. Data were validated relative to the Precision, Accuracy, Representativeness, Completeness, and Comparability (PARCC) parameters described in the next section. Validation is also currently performed on a site-wide basis at ~25% frequency by K-H Analytical Services Division. Satisfactory validation at this frequency indicates that the subcontracted labs are operating competently relative to industry-wide standards, and more specifically, that sample custody and analytical procedures are implemented under defined quality controls. Sitewide data validation coupled with annual lab audits provides the inference that all analytical and radiochemical results not specifically validated, are represented by the percentage that is validated. Original V&V packages for the T-1 Project are managed and filed by the K-H Analytical Services Division, Building 881.

Several project-specific audits by the project's QA coordinators were also performed before and during the project to ensure that critical controls were in place prior to data gathering activities in the trench. These audits, or assessments (RMRS Surveillance No. RMRS-98-0116, -0117, -0118, -0130, -0120, and -0132), addressed various project processes, including records management and measurement equipment, and documented the status quo relative to the project's (and the site's) Quality requirements. Disparities noted in the program were corrected prior to any negative impacts on the project or related data.

Verification and validation of the project's data, given in Sections 7.1 through 7.3, included use of the following protocols and guidance:

- Rocky Flats Administrative Procedure 2-G32-ER-ADM-08.02, Evaluation of ERM Data for Usability in Final Reports,
- EPA, 1994. USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review, EPA 540/R-94/013,
- EPA, 1994. USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review, EPA 540/R-94/012,
- EPA, 1996. EPA QA/G-9. Guidance for Data Quality Assessment, Practical Methods for Data Analysis.

### 7.3 PARCC Parameters

The following Subsections detail the PARCC evaluation performed on the T-1 data set.

#### 7.3.1 Precision

Precision is a measure of the reproducibility of results. Typically, precision is evaluated from 2 perspectives:

- 1) an analytical standpoint, i.e., reproducibility within the lab that reflects analytical precision inherent to the method; and,
- 2) an overall project standpoint, which combines both analytical precision and reproducibility of the field sampling method and specific matrix type.

Precision may be expressed quantitatively by at least two functions. The most typical measure for nonradiological analyses is the relative percent difference (RPD) term. Because of the stochastic nature of radioactivity, a statistical measure is better suited for evaluating radiological reproducibility. This is known as the duplicate error ratio (DER).

$$RPD = \frac{|C_1 - C_2|}{(C_1 + C_2)/2} * 100$$

where:

$C_1$  = first sample

$C_2$  = duplicate sample

$$DER = \frac{|C_1 - C_2|}{\sqrt{(TPU^2_{C1} + TPU^2_{C2})}}$$

where:

TPU = total propagated uncertainty

note: counting error, also known as the 2-sigma error, may be used in lieu of the TPU as a conservative measure; if precision exceeds the critical value of 1.96, TPU should be used in the equation prior to qualifying precision of the measurements in question.

The DQO for field duplicate frequency (for sample collection and analysis) was attained for all contaminants of concern and matrix types; results from the precision evaluation are discussed below and summarized in Table 7-2.

#### Radiological Surveys (RFETS-specific procedures)

Precision of the radiological instrumentation was satisfactory based on periodic (daily) tolerance charting of source measurements. Any measurement that exceeds defined tolerance limits ( $\pm 20\%$ ) results in corrective action (e.g., instrument repair or replacement) before measurement of real samples. Tolerance specifications may be found in the applicable *Radiological Safety Practices*.

#### Job-site Gamma Spectroscopy

The most significant indicator of satisfactory precision of the project, gained through performance evaluation/validation vs. systematic validation alone, resides in the favorable comparison between the RFETS project-specific results and the same samples reanalyzed by the CDPHE (12 total). All split samples were within predefined tolerance, expressed as the DER, which is an industry standard measure for evaluating whether two samples are significantly different. "Significance" is defined in the statistical sense and indicates that, with 95% confidence, the samples were derived from the same population, and therefore are not significantly different from one another. CDPHE results are included in Appendix C.

#### Laboratory Alpha Spectroscopy

Data validation revealed no problems with precision relative to alpha spectroscopy.

TABLE 7-2 SUMMARY OF PRECISION COMPLIANCE WITH PROJECT DQOS

| Excavation Bounds         | RIN-EVENT<br>(sample ID) | Location | VTX-X   |     | SVOCs<br>(General) | PCBs<br>(Aro-254) | Cyanide |       | Asbestos<br>Total | Arsenic<br>Precision within tolerance? (<20% by wt, <30% solid) <sup>(1)</sup> | Barium | Cadmium | Chromium | Lead | Selenium | Silver | Hg | Job-site reanalysis spec |        |        | Lab 559<br>Reference (3) |
|---------------------------|--------------------------|----------|---------|-----|--------------------|-------------------|---------|-------|-------------------|--|--------|---------|----------|------|----------|--------|----|--------------------------|--------|--------|--------------------------|
|                           |                          |          | Toluene | POE | TCE                |                   |         | Total |                   |  |        |         |          |      |          |        |    | U-235                    | U-235  | Am-241 |                          |
| Excavation Bounds         | 98A2111-014              | EB0203E  | YES     | YES | YES                | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2111-015              | EB0203E  | YES     | YES | YES                | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2111-027              | EB0406   | YES     | YES | YES                | NA                | YES     | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2111-028              | EB0406   | YES     | YES | YES                | NA                | YES     | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2111-037              | EB0308   | NA      | NA  | NA                 | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2111-038              | EB0308   | NA      | NA  | NA                 | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-023              | X09852   | YES     | YES | YES                | YES               | NA      | NA    | NA                | NA   | YES    | YES     | YES      | YES  | YES      | YES    | NA | NA (1)                   | NA (1) | NA (1) | NA                       |
|                           | 98A2105-024              | X09852   | YES     | YES | YES                | YES               | NA      | NA    | NA                | NA   | YES    | YES     | YES      | YES  | YES      | YES    | NA | NA (1)                   | NA (1) | NA (1) | NA                       |
|                           | 98A2105-043              | X09892   | YES     | YES | YES                | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-044              | X09892   | YES     | YES | YES                | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
| Depleted U                | 98A2105-093              | X09899   | YES     | YES | YES                | NA                | NA      | NA    | NA                | NA   | YES    | YES     | YES      | YES  | YES      | YES    | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-099              | D88412   | YES     | YES | YES                | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-100              | D88412   | YES     | YES | YES                | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-110              | D82894   | YES     | YES | YES                | NA                | YES     | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-111              | D82894   | YES     | YES | YES                | NA                | YES     | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-152              | D93281   | YES     | YES | YES                | YES               | YES     | NA    | NA                | NA   | YES    | YES     | YES      | YES  | YES      | YES    | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-153              | D93281   | YES     | YES | YES                | YES               | YES     | NA    | NA                | NA   | YES    | YES     | YES      | YES  | YES      | YES    | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-162              | D93277   | YES     | YES | YES                | NA                | YES     | NA    | NA                | NA   | YES    | YES     | YES      | YES  | YES      | YES    | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-163              | D93277   | YES     | YES | YES                | NA                | YES     | NA    | NA                | NA   | YES    | YES     | YES      | YES  | YES      | YES    | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-166              | D93288   | YES     | YES | YES                | YES               | YES     | NA    | NA                | NA   | YES    | YES     | YES      | YES  | YES      | YES    | NA | YES                      | YES    | YES    | NA                       |
| Cyanide                   | 98A2105-167              | D93288   | YES     | YES | YES                | YES               | YES     | NA    | NA                | NA   | YES    | YES     | YES      | YES  | YES      | YES    | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-190              | X09822   | NA      | NA  | NA                 | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2105-191              | X09822   | NA      | NA  | NA                 | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | YES (2)                  |
|                           | 98A2109-003              | X10379   | NA      | NA  | NA                 | NA                | NA      | NA    | YES               | YES  | YES    | YES     | YES      | YES  | YES      | YES    | NA | YES                      | YES    | YES    | YES (2)                  |
|                           | 98A2109-004              | X10379   | NA      | NA  | NA                 | NA                | NA      | NA    | YES               | YES  | YES    | YES     | YES      | YES  | YES      | YES    | NA | YES                      | YES    | YES    | YES (2)                  |
|                           | 98A2112-003              |          | NA      | NA  | NA                 | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           | 98A2112-004              |          | NA      | NA  | NA                 | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           |                          |          | NA      | NA  | NA                 | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           |                          |          | NA      | NA  | NA                 | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
|                           |                          |          | NA      | NA  | NA                 | NA                | NA      | NA    | NA                | NA   | NA     | NA      | NA       | NA   | NA       | NA     | NA | YES                      | YES    | YES    | NA                       |
| Soil Stockpile (<5000ppm) |                          |          |         |     |                    |                   |         |       |                   |  |        |         |          |      |          |        |    |                          |        |        |                          |

(1) Th was reproducible  
(2) Composite samples that include the associated grab  
(3) Lab isotopic analysis, when compared w/ Gamma-spec results, were repeatable relative to action levels & project decisions  
(4) Rows with slanted pattern are the real samples; precision "Pass/Fail" results are tabulated per duplicate sample ID.

Best Available Copy

#### VOC (EPA 8260)

Laboratory precision was indeterminate for several samples within RINs 98A2105, 98A2111, 98A2112 due to nonexisting MS/MSD information. Instead of control on a customer based batch process, MS/MSD (lab QC) samples were systematically performed relative to real samples at a frequency of  $\geq 1:20$ ; therefore, associated data is not Rejected, but only qualified due to a frequency that is slightly less than what would be accomplished if implemented on batch-by-batch basis. However, the overall precision for VOC analyses within the project, and for all sample types, was satisfactory based on acceptable RPD values for all field duplicate results.

#### SVOC (EPA 1311/3510/8270)

Semivolatile organic compound (SVOC) results were validated at a frequency greater than the DQOs; all results were within precision tolerances.

#### PCBs (EPA 8081)

One of five (20%) PCB duplicate samples failed to meet quality objectives for repeatability. However, because these samples indicate a waste stream with PCB concentrations in excess of regulatory thresholds (numerous samples exceeded 50 ppm in DU), the levels of variation noted causing the precision tolerance to be exceeded ( $\sim 10$ ppm) are insignificant. Therefore, no qualification of data is warranted based on the relatively low levels of variation noted, especially within the context of a PCB contaminated waste stream.

#### Metals (TCLP, Total, and Mercury; EPA 1311/6010 & 7470)

TCLP cadmium results are qualified as estimates only due to lab duplicate results out of tolerance; those samples (depleted U) qualified are: 98A2105-38, -51, -121, -127, -133, -139, -146, -152, -153, -159, -166, -167, and -173 (13 samples).

#### Cyanide (EPA 9010)

Precision of cyanide results representing the remediation effort, i.e., the excavation floor and walls, was adequate based on the repeatability of all (6) sample results at levels well below regulatory action levels (29 mg/kg maximum  $\ll$  RFCA action level of 154,000 mg/kg).

Overall cyanide precision was unacceptable for the cemented cyanide wastestream, based on the one field duplicate evaluated, which yielded an RPD in excess of 50%. However, because all cyanide samples yielded results well above action levels (i.e.,  $>20$  times the action level of 590

ppm, LDR for Total Cyanide), qualification of the results does not impact the waste management decision for the waste stream in question.

#### Asbestos (EPA 40 CFR 763, Subpart F, Appendix A)

One duplicate sample was in agreement with the associated real, as both exceeded the 1% (by volume) action level for asbestos. Asbestos was identified in both samples of cemented cyanide waste submitted for analysis and grossly quantified mesoscopically (i.e., without a microscope). RPD values were not calculated, as both samples clearly exceeded action level. Like many of the other contaminants of concern for this project, concentrations of asbestos were relatively high where samples were acquired, and thus the potential for false negatives due to imprecision are essentially nil.

#### 7.3.2 Accuracy

Accuracy is a measure of how closely an analytical or survey result corresponds to the "true" concentration or activity in a sample. Systematic uncertainties that affect accuracy, also known as bias, are also included under this section.

#### Radiological Surveys (RFETS-specific procedures)

Accuracy of radiological surveys is satisfactory based on annual calibrations of instrumentation and daily source checks that must perform within specified tolerances ( $\pm 20\%$ ) as specified in the *Radiological Safety Practices*.

#### Job-site Gamma Spectroscopy

The accuracy of gamma is corroborated through two varieties of validation implemented for the project: systematic validation, and more importantly, performance validation, i.e., use of performance evaluation (PE) samples to validate the entire gamma spectroscopy measurement system relative to the site specific matrix types and radiological levels of interest.

The performance evaluations were performed before real sample analyses were measured by the gamma spectroscopy system as a prerequisite. Three (3) PE samples were acquired by the project, from an independent Standards Laboratory, to evaluate the gamma spectroscopy vendor's capability to perform within quality requirements. The PE samples were designed to represent the most important sample types (matrices) of interest for the project, as well as qualify

the measurement systems' accuracies through a range of energies and activities. The PE samples, which were blind to the vendor, consisted of:

- 1) a common industry standard spiked with 9 different isotopes, with energy ranges (in keV) and activities (dps) within ranges representative of those isotopes expected on site,
- 2) a soil sample spiked with actinides common to RFETS (spike values were at relatively low activity levels); and,
- 3) a relatively low (activity) spike value of  $\text{Am}^{241}$  within a depleted Uranium matrix (high activity), to ensure the system's capability of detecting  $\text{Am}^{241}$  in samples consisting primarily of depleted U (a combination which typically presents interferences in  $\text{Am}^{241}$  identification/quantification).

All measurement systems used by the vendor met the performance criteria set forth as a prerequisite to project start-up; the performance criteria consisted of yielding measured results (average value of 3 replicates) to within  $\pm 20\%$  of the true PE value, as certified by a standards lab. The systematic validation of gamma-spec results yielded no significant qualifications to the data.

#### Laboratory Alpha Spectroscopy

All alpha spec data were acceptable without qualification.

#### VOC (EPA 8260)

Laboratory control samples (LCS) and/or matrix spike (MS) samples were either not run or not included within data packages for samples including RINs 98A2111 (22 samples; excavation boundaries), 98A2112 (4 samples; soil stockpile  $< 5000\text{cpm}$ ) and 98A2105 (DU) and could bias the associated results either high or low. As a result, the associated samples are qualified as estimates. However, for the data packages in question, the lab reports that MS samples are systematically run and evaluated for every 20 samples of throughput, which would constitute process control of accuracy, albeit in a less rigorous way than through batching.

Several blanks were contaminated with VOCs (especially with TCE), but these occurrences had no practical impact on sample results due to the significantly higher levels of like VOCs in the real samples. Stated differently, the potential for contamination to cause a high bias in real results was insignificant because of the relative, and significant, lower levels of VOCs in the QC samples. Blank contaminations did not impact project decisions (e.g., waste management, H&S,

etc). Acetone was rejected in many samples due to low relative response factors ( $<0.05$ ) in calibrations (initial and continuing).

#### SVOC (EPA 1311/3510/8270)

Accuracy of SVOCs are adequate, except for the qualifications listed below, based on the following analytical quality controls:

- initial calibration and continuing calibration of the measuring instrumentation,
- performance checks (DFTPP),
- internal standard area/retention time checks,
- laboratory control samples,
- matrix spikes, and
- blank results (method and TCLP).

Qualifications consist of rejecting all SVOC results for samples 98A2105-005 and -076 (2 DU samples) due to unacceptable surrogate recovery ( $<10\%$ ). All non-detect results were also rejected for samples 98A2105-005.004 and -076.004 due to gross Exceedence of holding times (28 days).

#### PCBs (EPA 8081)

Due to a low surrogate recovery (between 10% and 30%) in sample 98A2111-037 (excavation boundary), the results are potentially biased low. In addition, only one surrogate was used for the batch 98A2111-A (4 samples), whereas 2 or more is commonly accepted as a minimum quality control. Many of the DU samples (RIN 98A2105) are potentially biased low due to exceedence of hold times, as well as samples 98A2116-009 and -011 (VOC-contaminated soil) and 98A2106-001 (lathe coolant).

#### Metals (TCLP, Total, and Mercury; EPA 1311/6010 & 7470)

With the exception of the qualified results discussed below, accuracy of metals results is adequate based on the following analytical quality controls:

- initial calibration and continuing calibration of the measuring instrumentation,
- interference check samples,
- serial dilutions,
- laboratory control samples,
- matrix spikes, and
- blank results (preparation and TCLP).



Qualification of results includes a potentially low bias for the following (DU) samples and the associated metals of interest due to matrix spikes out of control or matrix interference:

| <u>Sample ID</u>   | <u>Metal, potentially biased low</u> |
|--|--------------------------------------|
| 98A2105-179  | Cr                                   |
| 98A2105-045, -063, -064  | As                                   |
| 98A2105-051, -030, -024, -023, -021, -017                            | As, Se                               |
| 98A2105-057, -070, -076, -083, -089, -095,<br>-102, -108, -115, -121 | As, Ag                               |

#### Cyanide (EPA 9010)

All cyanide results were valid without qualification on accuracy.

#### Asbestos (EPA 40 CFR 763, Subpart F, Appendix A)

Accuracy for asbestos volumetric concentrations is based on the quantitative technique of petrography via polarized light microscopy. Experienced petrographers can typically quantify components to within several percent at high concentrations ranging to ~1% at low concentrations (essentially presence or absence of the mineral of interest). Accuracy for the project is adequate, as all samples with asbestos present had much greater than 1% asbestos by volume, the regulatory action level for asbestos.

### 7.3.3 Representativeness

All samples and surveys are representative, with exceptions noted below, based on the following criteria:

- familiarity with facilities -- multiple walk-throughs and collaborations by and within the sampling team,
- implementation of industry-standard Chain-of-Custody protocols,
- compliance with sample preservation and hold times,
- industry-standard and EPA-approved analytical methods (listed in Section 7.3.1),
- site-approved radiological survey methods; and,
- compliance with the SAPs (RMRS 1998c and Starmet, 1998) -- reviewed & approved by management consensus.

### VOCs

All non-detect values are rejected due to exceedence of hold times for the following samples:

- ▶ 98A2105-185 through -196 plus -201 (depleted U)
- ▶ 98A2105-199, -205, -197, -198, -200, -202, -203, -207 (2 trip blanks included)
- ▶ 98A2105-132 through 140, -142, -143, -145 through 151, -155, -156 (3 trip blanks included)
- ▶ 98A2105-088, -096, -101, -103, -105, -106, -107, -109, -110, -116 (4 trip blanks included)
- ▶ 98A2105-152 through 154; and -157 through -165 (2 trip blanks)
- ▶ 98A2116-011, -012 (soil >25 ppm organic vapor)

Several samples from the excavation confirmation group were noted as being received at the lab with a temperature of ~20 degrees (C). Ordinarily this would be considered a sample preservation problem, however, these samples were transported from the sampling location to the lab in such a short time frame that samples did not have time to fully chill. Therefore, sample preservation protocols were followed in this instance and false negatives due to inadequate preservation are not a possibility.

To summarize the VOC qualifications, the rejection of the samples listed above, as well as the associated low bias for samples with detections, does not impact project decisions relative to the waste streams due to the abundance of VOC detections that exceeded regulatory thresholds and consequent categorization as hazardous waste. Any false negatives that occur due to the biases discussed above have no bearing on the waste management and disposition.

### SVOCs

All non-detect values are rejected due to gross exceedence of hold times for the following samples: 98A2105-153 through -167 (4 of approximately 39 SVOC samples of DU collected in total). Any false negatives that occur due to the biases discussed above have little bearing as enough SVOC data was collected without qualification.

### PCBs

PCB results for the following DU samples are potentially biased low due to missed hold times

- ▶ 98A2105-021, -023, -029, -116, -119, -125, -126, -127, -148, -163 through -167, -169, -170, -171, -172, -173, -175, -176, -177, -178, 179, -181, -187, -190, -201
- ▶ 98A2116-009 and -011 (VOC-contaminated soils)

55

Because PCBs were detected at relatively high concentrations in the DU wastestream (RIN 98A2105), and were therefore classified as PCB Remediation Waste, a low bias in several of the sample results did not impact waste determinations.

For the VOC contaminated soil (RIN 98A2116), the highest detection of PCBs was 16 mg/kg which is less than half of the nearest PCB action level. Given the chemical stability of PCBs, it is unlikely that missed holding times would bias measured concentrations to be less than TSCA waste classification thresholds.

#### Radiological Surveys

All radiological surveys and analytical methods were performed to controlled, approved procedures.

#### 7.3.4 Completeness

All T-1 data (~100%) were verified at the project level based on comparing planned samples (based on Chain-of-Custody records) with hardcopy data received from the laboratories. Verifications were performed in the field as work progressed, as analytical results affected real-time remedial decisions. The completeness goal easily exceeded the 90% DQO, as many more samples were acquired than were formally required in the SAPs of which approximately 99% were usable, based on an inventory of sample results received from the vendors as compared with original COCs maintained in the project files.

The minimum requirement for data validation was specified as 25% for the project data set as a whole, and the project achieved this goal. In addition to the 25% validation requirement for the T-1 data set as a whole, an effort was also made to orient the validations through a representative cross-section of each material category and analytical/radiological suite. In general, most categories were captured in the validation process, with the following exceptions; on-site gamma-spec on debris samples/lathe coolants and offsite analyses of cemented cyanides. Formal verification and validation packages are managed and archived with K-H Analytical Services Division in Building 881.

#### 7.3.5 Comparability

All results presented are comparable with sampling and analyses (methods and media) on a national and DOE complex wide basis. This comparability is based on nationally recognized

methods (especially EPA-approved methods), systematic quality controls, and thorough documentation of the planning, sampling, and analysis process.

#### 7.3.6 Sensitivity

Sensitivity is evaluated by comparing actual quantitation limits of the results with the regulatory or project-specific action levels stipulated for decision-making. All analytical and radiological methods achieved adequate sensitivities in that quantitation limits were below regulatory thresholds, typically with a quantitation limit at less than 50% of the threshold.

#### 7.3.7 Data Summary

In summary, the overall data sets acquired and evaluated for Trench 1 were satisfactory for supporting the (data quality) objectives for which they were acquired. The basic objectives, or decisions, consisted of:

- 1) whether several soil subpopulations are above or below regulatory (RFCA & PAM) thresholds, and
- 2) the types of waste streams generated and their acceptability under applicable WAC.

Qualifications to the data are discussed throughout this chapter; the stated qualifications did not impact final decisions or conclusions of the project because enough conservatism was designed into the SAP to compensate for limited amounts of estimated or rejected data. More specifically, many values were qualified as potentially biased low, or rejected as Non-detect values; especially VOCs. However, the potential for false negatives in the waste streams did not impact project decisions relative to waste handling because all waste streams with potential low bias also had associated results (i.e., of the same contaminant of interest) that were well above regulatory thresholds, and thus waste categorization was defined by the "hits" above thresholds and not the lack thereof.

Limited qualifications were made to sample results representing potential impacts to the trench boundaries or stockpiled soil that was used as trench backfill material; no data were rejected. As a result, the final data quality achieved confidence levels consistent with original DQOs of the project.

## 8.0 REFERENCES

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RMRS, 1998c, *Sampling and Analysis Plan to Support the Source Removal at the Trench T-1 Site, IHSS 108*, RF/RMRS-98-205, Rev 0., April.

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RMRS, 1999a, *T-1 Waste Characterization and Disposition Pathways Analysis Report*, RF/RMRS-99-303.UN, Rev 1., March.

RMRS, 1999b, *Field Implementation Plan for Removal of the Discovered Container at Trench 1 (IHSS 108)*, RF/RMRS-99-310, Rev 0., January.

Starmet, 1998, *Starmet Sampling and Analysis Plan for the Source Removal at Trench 1 IHSS 108*, RF/RMRS-98-220, Rev 1., April.

Appendix A  
T-1 Restart Letters

- Appendix A-1 Restart Letter Regarding Rapid Oxidation of DU (pyrophoric activity)
- Appendix A-2 Restart Letters Regarding Encounter with Uranium Hydride Potentially  
Containing Tritium
- Appendix A-3 Restart Letter Regarding Encountering Asbestos Within the Cemented  
Cyanide Matrix

Closeout Report for the Source Removal  
at the Trench 1 Site IHSS 108

Document Number.: RF/RMRS-99-302.UN  
Revision: 0  
Page: Appendices

Appendix A-1  
Restart Letter Regarding  
Rapid Oxidation of DU (pyrophoric activity)



Rocky Mountain  
Remediation Services, L.L.C.  
... protecting the environment

## INTEROFFICE CORRESPONDENCE

DATE: June 11, 1998

TO: John E. Law, Director Environmental Restoration, T893B, x4842

FROM: Wayne Sproles, Environmental Restoration Projects, T893B, x5790 *WMS*

SUBJECT: Request for Approval to Restart Trench 1 Excavation Operations -  
WRS-030-98

The purpose of this correspondence is to provide a summary of the actions that will be taken during excavation to address elevated temperature measurements and request your approval to restart excavation activities at the Trench 1 site.

Activities were suspended on June 10, 1998 after temperature measurement and visual observations indicated a rapid oxidation of a non-intact drum of depleted uranium upon removal from the trench. In accordance with RFETS 1-D97-ADM-16.01, "Occurrence Reporting Process," the event was not a reportable occurrence. A manager's meeting was held on Wednesday, June 10 at 1530 hours in the T891C conference room to discuss issues involving the thermal reaction of excavated depleted uranium drums at the T-1 trench. Thirty-eight people attended the managers meeting (see Attachment A).

The managers meeting concluded that the following actions will be taken:

- 1) Modifications to Operations Order OO-T1-09, "Temperature Measurements Of Depleted Uranium Using Infrared Heat Gun," and the Trench 1 HASP to require continuous temperature monitoring of intact or non-intact drums until completion of inerting activities. Changes were also made to the response actions, including returning the intact or non-intact drums to the trench for inerting with soil when temperature measurements exceed action levels.
- 2) Changes in the excavation methodology, including removal of material from non-intact drum carcasses in the trench, mixing/inerting of depleted uranium material with soil in the trench if the temperature levels in OO-T1-09 are exceeded, excavating the mixed material, and placing the material in a B-12 container.
- 3) Changes will be discussed with the Trench 1 Team during the daily pre-evolution briefing prior to re-start of excavation activities.
- 4) Applicable documents have been reviewed to ensure that changes to Operations Order OO-T1-09, and the T1 HASP, do not impact the scope or requirements of these documents.



Annette Primrose

June 11, 1998

WRS-030-98

Page 2

It should also be noted that the T-1 Project Team reacted in accordance with approved procedures in responding to the event. Radiological monitoring activities performed during and after the event (radiation surveys, contamination surveys, air monitoring) were below action levels. Based on contamination surveys there was no spread of contamination to personnel, equipment, or the area adjacent to the Trench.

The proposed actions have been implemented. Please indicate your approval for restart by signing below.

Approved:

*AE Primrose* 6-11-98  
for J. E. Law, Director Environmental Restoration

aw

Attachment:

As Stated

cc:

M. Burmeister, T893B

C. Crawford, B116

F. Hughes, T893A

C. Patnoe, T130C

D. Primrose, T893B

D. Swanson, T893B

R. Wagner, T893B

RMRS Records

**TRENCH 1 SOURCE REMOVAL PROJECT  
FACT FINDING MEETING ATTENDANCE ROSTER**

DATE: 6/10/98 TRACKING NUMBER:

[illegible]

67

**TRENCH 1 SOURCE REMOVAL PROJECT  
FACT FINDING MEETING ATTENDANCE ROSTER**

DATE: 6/10/98 TRACKING NUMBER:

[illegible]

**TRENCH 1 SOURCE REMOVAL PROJECT  
FACT FINDING MEETING ATTENDANCE ROSTER**

DATE: \_\_\_\_\_ TRACKING NUMBER: \_\_\_\_\_

[illegible]

Closeout Report for the Source Removal  
at the Trench 1 Site IHSS 108

Document Number.: RF/RMRS-99-302.UN  
Revision: 0  
Page: Appendices

Appendix A-2  
Restart Letters Regarding  
Encounter with Uranium Hydride Potentially Containing Tritium



## INTEROFFICE MEMORANDUM

DATE: August 6, 1998

TO: John Law, Environmental Restoration Projects, T893B, x4842

FROM: Wayne Sproles, Environmental Restoration Projects, T893B, x5790 *WRS*

SUBJECT: LIMITED RESTART OF TRENCH 1 EXCAVATION ACTIVITIES -  
WRS-048-98

The purpose of this correspondence is to request approval for a limited restart of the Trench 1 Project. Per the managers meeting held on August 6, 1998, in T900F, the path forward is to conduct an entry into the tent to collect approximately 10 tritium swipe samples, two water samples from a bucket of water that is adjacent to the trench, one soil sample from the 55-gallon drum, and one soil sample from the B-12. The soil samples will be collected from the waste containers that contain the depleted uranium material from Lawrence Livermore. Five of the tritium swipe samples will be analyzed by ThermoNutech and it is anticipated that the remaining samples will be analyzed at EPI Laboratories in South Carolina. The shipment of samples to EPI will be based on the results of DOT shipping screens that will be performed by ThermoNutech. If the level of radioactivity in the soil samples exceeds the EPI's radioactive material license, another approved laboratory will be selected.

A new Activity Hazard Analysis has been prepared to address the hazards associated with this evolution. The staytime within the tent will be based on WBGT reading inside the tent structure. WBGT readings and staytimes will be closely monitored by Health and Safety. PPE for this evolution has been evaluated and will remain unchanged from PPE that is used for excavation activities.

The following schedule of events for this evolution is based on the collection of samples on August 6, 1998:

August 6, 1998 Collect samples from the tent interior. Swipe samples and DOT shipping screens will be shipped to ThermoNutech for analysis.

August 7, 1998 Sample analysis at ThermoNutech will be completed and evaluated by the project SMEs. Sample analysis will take approximately 12 hours from the time the samples are submitted to ThermoNutech. Samples will be shipped to EPI based on the results of DOT shipping screens analyzed by ThermoNutech. If the analysis indicates no

J. E. Law  
August 6, 1998  
WRS-048-98  
Page 2

If the sample results are not conclusive, then the project will remain on hold awaiting analytical results from EPI.

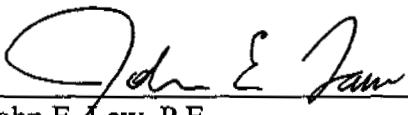
August 11, 1998 Completion of analysis at EPI. The analysis of samples at EPI will be completed three days from receipt at the EPI Laboratory.

August 27, 1998 Completion of bioassay analysis. The analysis of samples at EPI will be completed fourteen days from receipt at the EPI Laboratory.

The project staff is working closely with the Analytical Program Office to expedite sample analysis at the offsite laboratories.

A separate request for restart of excavation activities will be submitted for approval after receipt and evaluation on the analytical results. In addition, a separate letter has been approved by Radiological Safety to perform this evolution.

APPROVAL:

 8/6/98  
\_\_\_\_\_  
John E. Law, P.E. Date  
Director  
Environmental Restoration Projects

laa

cc:

M. C. Burmeister  
F. P. Hughes  
R. A. Wagner  
RMRS Records





## INTEROFFICE MEMORANDUM

DATE: August 6, 1998

TO: John Law, Environmental Restoration Projects, T893B, x4842

FROM: Wayne Sproles, Environmental Restoration Projects, T893B, x5790

SUBJECT: LIMITED RESTART OF TRENCH 1 EXCAVATION ACTIVITIES –  
WRS-048A-98

The purpose of this correspondence is to request approval for a limited restart of the Trench 1 Project. Per the managers meeting held on August 6, 1998, in T900F, the path forward is to conduct an entry into the tent to collect approximately 10 tritium swipe samples, two water samples from a bucket of water that is adjacent to the trench, one soil sample from the 55-gallon drum, and one soil sample from the B-12. The soil samples will be collected from the waste containers that contain the depleted uranium material from Lawrence Livermore. Five of the tritium swipe samples will be analyzed by ThermoNutech and it is anticipated that the remaining samples will be analyzed at EPI Laboratories in South Carolina. The shipment of samples to EPI will be based on the results of DOT shipping screens that will be performed by ThermoNutech. If the level of radioactivity in the soil samples exceeds the EPI's radioactive material license, another approved laboratory will be selected.

A new Activity Hazard Analysis has been prepared to address the hazards associated with this evolution. The staytime within the tent will be based on WBGT reading inside the tent structure. WBGT readings and staytimes will be closely monitored by Health and Safety. PPE for this evolution has been evaluated and will remain unchanged from PPE that is used for excavation activities.

The following schedule of events for this evolution is based on the collection of samples on August 6, 1998:

August 6, 1998 Collect samples from the tent interior. Swipe samples and DOT shipping screens will be shipped to ThermoNutech for analysis.

August 7, 1998 Sample analysis at ThermoNutech will be completed and evaluated by the project SMEs. Sample analysis will take approximately 12 hours from the time the samples are submitted to ThermoNutech. Samples will be shipped to EPI based on the results of DOT shipping screens analyzed by ThermoNutech. If the analysis indicates no

J. E. Law  
August 6, 1998  
WRS-048A-98  
Page 2

If the sample results are not conclusive, then the project will remain on hold awaiting analytical results from EPI.

August 11, 1998 Completion of analysis at EPI. The analysis of samples at EPI will be completed three days from receipt at the EPI Laboratory.

August 27, 1998 Completion of bioassay analysis. The analysis of samples at EPI will be completed fourteen days from receipt at the EPI Laboratory.

The project staff is working closely with the Analytical Program Office to expedite sample analysis at the offsite laboratories.

A separate request for restart of excavation activities will be submitted for approval after receipt and evaluation on the analytical results. In addition, a separate letter has been approved by Radiological Safety to perform this evolution.

APPROVAL:

---

|                                    |      |
|------------------------------------|------|
| John E. Law, P.E.                  | Date |
| Director                           |      |
| Environmental Restoration Projects |      |


laa

cc:  
M. C. Burmeister  
F. P. Hughes  
R. A. Wagner  
RMRS Records



DATE: August 10, 1998

TO: John E. Law, Environmental Restoration Projects, T893B, x4842

FROM: Wayne R. Sproles, Environmental Restoration Projects, T893B, x5790 

SUBJECT: LIMITED RESTART OF TRENCH 1 EXCAVATION ACTIVITIES -  
WRS-049-98

The purpose of this correspondence is to request approval to restart the Trench 1 Source Removal Project, with the exception of sampling wastes containing uranium hydride.

It was decided at the Managers Meeting held on August 7, 1998 with RMRS, Kaiser-Hill and DOE, that the following actions will be completed prior to restart:

- Review of the swipe sample results from the offsite laboratory to further confirm that tritium was not encountered, and
- Re-evaluation of the hazards and controls associated with excavation, packaging and sampling activities.

It was also decided at the meeting that restart authority for excavation activities will reside with RMRS Director of Environmental Projects and the SSOC Division Manager of Radiological Safety.

Analytical results from swipe samples collected inside the tent structure and a water sample collected from a bucket of water adjacent to the trench indicate tritium was not present above the instrument MDA. In addition, an air sample, collected from a sealed drum containing the suspect material was analyzed by Thermo-Nu-Tech and indicated that tritium was not present above background levels.

On August 10, 1998, the Trench 1 Project Team re-evaluated the work process, hazards, and controls associated with the excavation activities. It was determined that existing project implementation documents satisfactorily address the hazards associated with excavation activities and the controls already in place are appropriate for handling uranium hydride. Although the process will remain unchanged, the project team will be instructed to better communicate changing conditions, and to limit

J. E. Law  
August 10, 1998  
WRS-049-98  
Page 2 of 2

the number of personnel around the excavator bucket to only those that are essential during monitoring activities.

On August 10, 1998, a meeting was held with Building 559 personnel to discuss transfer, preparation, and analysis of uranium hydride samples as well as the potential fire hazards associated with these activities. Building 559 personnel are currently evaluating their authorization basis, existing procedures, and fire protection measures.

The Trench 1 Project Team is evaluating the process for sampling uranium hydride wastes, packaging and transferring samples to Canberra for gamma spectroscopy analysis, and subsequently transferring samples to Building 559 for VOC, PCB and isotopic analyses.

Based on historical documentation, we believe that all of the uranium hydride wastes have been excavated from the trench. However, in the event that additional uranium hydride is encountered, the material will be placed in a waste container, inerted, and temporarily staged until restart has been approved for sampling uranium hydride.

A separate letter has been approved by the SSOC Division Manager of Radiological Safety to resume excavation activities with no additional radiological controls beyond those already being implemented.



John E. Law, P.E.  
Director  
Environmental Restoration

wrs

cc:  
RMRS Records  
M. Burmeister  
F. Hughes  
R. Wagner



**Rocky Mountain  
Remediation Services, L.L.C.**  
*... protecting the environment*

Rocky Flats Environmental Technology Site  
P.O. Box 464  
Golden, Colorado 80402-0464  
Phone: (303) 966-7000

August 10, 1998

Don Harward  
Divison Manager, Radiological Safety  
Safe Sites of Colorado, L.L.C  
Building T130C

**RECOMMENCE NORMAL EXCAVATION ACTIVITIES ON THE TRENCH-1 PROJECT  
– JEL-0143-98**

The Trench -1 (T-1) Project is requesting your concurrence, by signature below, to recommence normal excavation activities on the Trench-1 project. The suspected presence of tritium, based on a concern expressed by SSOC Radiological Engineering, has been investigated through the collection and analysis of smear samples and one sample of water in a bucket located near the trench.

The results of these analyses, using distillation and liquid scintillation counting performed by Environmental Physics Inc., indicates no tritium present above background levels. In addition, an air sample, collected from of a sealed container containing the suspect material, was analyzed by Thermo-Nu-Tech and indicated no tritium above background levels.

As a result, on the basis of the speculative nature of the tritium concern in the first place, and on this confirmation of the absence of tritium, the Trench-1 project will proceed with no additional radiological controls beyond those already implemented. This course of action has been presented to the entire T-1 project team, and has been accepted by them.

John Law  
Director  
Environmental Restoration Projects

Approval Signature

Don Harward

8/10/98


Date



## INTEROFFICE MEMORANDUM

DATE: August 11, 1998

TO: John Law, Environmental Restoration Projects, T893B, x4842

FROM: Wayne Sproles, Environmental Restoration Projects, T893B, x5790 

SUBJECT: RESTART OF TRENCH 1 SAMPLING ACTIVITIES - WRS-051-98

The purpose of this correspondence is to request approval to restart Trench 1 Project sampling activities. Sampling of uranium hydride was suspended when three metal cans containing ~250-ml glass jars suspected of containing uranium hydride (one of the jars was marked "UH<sub>3</sub>") were excavated on 8/5/98. Excavation activities were restarted on 8/11/98 (Reference WRS-049-98, 8/10/98). Sampling of uranium hydride was not restarted at this time to ensure that the controls are in place to sample this potentially hazardous material.

Based on a meeting between Trench 1, Building 559, and fire protection personnel held on 8/10/98, and subsequent discussions among Trench 1 Project personnel involved in the sampling process, the following "path forward" is proposed:

1. Review project documentation to determine if existing plans and procedures adequately cover the sampling of uranium hydride (Action completed 8/11/98 - no changes necessary).
2. Sample the 55-gallon drum and B-12 waste crate containing the uranium hydride wastes. Personnel will use long-handled tools to collect the samples. Inerting materials will be readily available in the event of a pyrophoric reaction. This sampling activity is adequately covered by existing activity hazard analyses and the Starmet Sampling and Analysis Plan.
3. Perform gamma spectroscopy analysis on the samples obtained from the 55-gallon drum and B-12 waste crate. Following gamma spectroscopy analysis, these samples will be transferred to the Building 559 lab for analysis.
4. Quantify the number, approximate weight and volume of intact jars excavated on 8/5/98. These jars are currently contained in a 55-gallon drum, a 1-gallon paint can, and a B-12 waste crate staged inside the tent near the

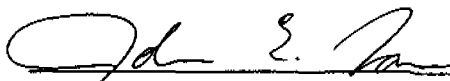
J. E. Law  
August 11, 1998  
WRS-051-98  
Page 2

Sampling and Inerting Pad. A task specific pre-evolution brief will be conducted prior to performing this activity.

5. Transfer the contents of the 55-gallon drum and the 1-gallon paint can into the B-12 waste crate to consolidate the uranium hydride wastes.
6. Coordinate with Fire Protection Engineering and Building 559 personnel to develop a plan for the safe packaging and transport of the intact jars from the tent to the gamma spectroscopy lab (i.e., T-900C) and subsequently to the lab in Building 559. These containers will be opened in a controlled manner in the Building 559 laboratory. If necessary, Operations Orders OO-T1-04, "On-site Transfer of Potentially Pyrophoric Samples From The Trench T-1 Source Removal Project," and/or OO-T1-07, "Packaging of Trench 1 (T-1) Waste," will be revised to address packaging and transport of the intact jars.

Building 559 personnel are currently assessing the adequacy of their authorization basis and procedural coverage with respect to the receipt and opening of the intact jars in their laboratory. Transfer of intact jars to Building 559 will not be performed until their assessment is complete.

APPROVED:

 8/11/98  
John E. Law, P.E. Date  
Director  
Environmental Restoration Projects

laa

cc:  
M. C. Burmeister  
F. P. Hughes  
R. A. Wagner  
RMRS Records




Rocky Mountain  
Remediation Services, L.L.C.  
... protecting the environment

## INTEROFFICE CORRESPONDENCE

DATE: September 1, 1998

TO: John E. Law, Environmental Restoration Projects, T893B, x4842

FROM: Wayne Sproles, Environmental Restoration Projects, T893B, x5790 

SUBJECT: MODIFICATION TO LETTER WRS-051-98, RESTART OF TRENCH 1  
SAMPLING ACTIVITIES - WRS-061-98

The purpose of the correspondence is to obtain approval for the sampling approach for uranium hydride ( $\text{UH}_3$ ) contained within two 55-gallon drums and one B-12 container inside the Trench 1 tent. Sampling activities associated with potential uranium hydride have been suspended since excavation of three metal cans containing ~250ml glass jars of material (one marked " $\text{UH}_3$ ") on 8/5/98. This correspondence supersedes previous correspondence on this evolution (WRS-051-98).

A meeting was held on August 31, 1998 with T-1 workers, Fire Protection Engineering, Radiological Engineering, RMRS Project Management, Kaiser-Hill Project Management, Kaiser-Hill Closure Projects Engineering and Integration, RMRS Health and Safety, Kaiser-Hill Air Quality Management, and RMRS Authorization Basis to review the sampling approach, the associated hazards, and the controls that will be implemented for worker safety.

On August 31, 1998, Air Quality Management completed a fire scenario model for this activity and determined that the potential impact associated with this evolution is within the bounding conditions established in the original model for the project.

On August 31, 1998, RMRS Authorization Basis agreed that the sampling evolution was within the existing authorization basis for Trench 1.

On September 1, 1998, Fire Protection Engineering completed a review of the Fire Hazard Analysis, and determined that the controls in the original FHA are adequate for this activity.

On September 1, 1998, a new Activity Hazard Analysis, specific to this sampling evolution, was approved. In addition, Trench 1 documents, plans and procedures were reviewed and determined to adequately cover sampling of uranium hydride material.

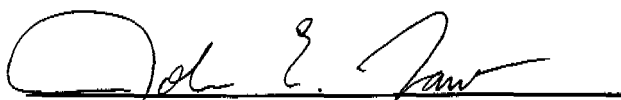
Building 559 Laboratory personnel have agreed to analyze the samples provided that the sample containers are 20 mL containers. Changes to laboratory procedures will not be required for 20 mL sample containers.



The proposed sampling approach is described as follows:

1. The 55-gallon drums and B-12 box that contain the uranium hydride will be opened and the contents will be examined to determine if additional intact sample containers exist. Personnel will use long-handled tools where appropriate to search for the sample containers, retrieve the sample containers, and collect samples from the intact sample containers.
2. Some direct handling of the sample containers will be required. Personnel handling the sample containers will be protected by fire and puncture resistant gloves.
3. Monitoring for tritium will occur during the evolution.
4. Inerting materials and fire extinguishing equipment will be readily available in the event a reaction is experienced and a full-time personnel/area fire watch will be posted.
5. Small fires, similar to those experienced previously, are anticipated and will not require a stop work unless the bounds set forth in the HSP and RWP are exceeded.
6. Personnel in the tent will be minimized during the evolution.
7. Samples from the intact sample containers will be transferred to the T900C Gamma Spectroscopy Laboratory and the Building 559 Laboratory for analysis.
8. At the completion of the sampling activity, the contents of the 55 gallon drum and B-12 box will be consolidated into the B-12 box.
9. Transportation of sample materials will be in accordance with approved Operations Order OO-T1-04 On-site Transfer of Potentially Pyrophoric Samples from the Trench-1 Source Removal Project.
10. The sampling approach, hazards associated with this sampling evolution, and the controls to be implemented for worker safety have been reviewed with the project team during the pre-evolution briefing on September 1, 1998. Worker input has been incorporated into the sampling methodology and hazard controls for the project.

Approved:



John E. Law, P.E.  
Director  
Environmental Restoration Projects

wrs

cc:  
M. Burmeister  
F. Hughes  
R. Wagner  
RMRS Records



## MEMORANDUM

DATE: March 10, 1999

TO: J.E. Law, Closure Management, Bldg. T893B, X4842

FROM: R.L. Griffis, Closure Management, Bldg. T893B, X4934

SUBJECT: INTERIM CONTINUATION OF TRENCH 1 OPERATIONS - RLG-011-99

On March 10, 1999, at approximately 0945 hours, a tritium alarm sounded in the T-1 tent. This detector and alarm were in place to support inerting of two sample jars of uranium hydride removed from a five-gallon bucket discovered during backfill operations. The drum in which the inerting was being conducted was placed in a safe configuration and personnel completed a controlled evacuation of the T-1 tent.


Notifications were made to Bob Griffis, Chip Sawyer, Bates Estabrooks, Tom Greengard, Deanna McCranie, John Law, Ted Hopkins, and Alan Rodgers.

A Fact Finding Meeting has been scheduled. To support this meeting and to ensure timely collection of data needed for occurrence reporting, I request authorization for interim restart of operations at T-1. This restart is to collect samples necessary to evaluate the presence or extent of tritium contamination, and to close the drum containing the inerted samples. No other operations will be conducted without full authorization from you.

Please indicate this approval by signing in the space indicated below. Please call me at extension 4934 if you have any questions.

rlg

APPROVED:

 3/10/99  
J.E. Law, P.E., Vice President Date  
South Side and ER Projects

cc:

A.C. Crawford  
T.A. Hopkins

F.P. Hughes  
RMRS Records

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Closeout Report for the Source Removal  
at the Trench 1 Site IHSS 108


Document Number.: RF/RMRS-99-302.UN  
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Page: Appendices  
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Appendix A-3  
Restart Letter Regarding  
Encountering Asbestos Within the Cemented Cyanide Matrix



DATE: August 13, 1998

TO: John Law, Environmental Restoration Projects, T893B, x4842

FROM: Wayne Sproles, Environmental Restoration Projects, T893B, x5790 

SUBJECT: Restart of Trench 1 Excavation Activities - WRS-053-98

The purpose of this memorandum is to request approval for restart of Trench 1 excavation activities. Per the T-1 HASP, Section 7.7, excavation activities were suspended on August 12, 1998 due to suspected asbestos in the cemented cyanide waste drums by visual observation. Analysis of the cemented cyanide samples on August 12, 1998, confirmed an asbestos concentration of approximately 15-25%.

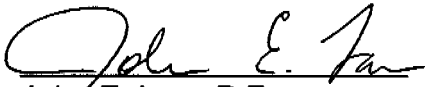
The following actions will be performed prior to restart to ensure work can proceed safely with minimal risk to workers:

1. Asbestos Awareness Training has been completed for required project personnel. (Complete 8/13/98)
2. On August 13, 1998 surface "tape" samples and continuous air monitor filter samples were collected from both vestibules and analyzed for asbestos. The samples were transferred to Building 881 for asbestos analysis by Polarized Light Microscopy. Sample results indicate that no asbestos fibers exist on the sample media and, therefore, there is no evidence of asbestos dispersion.
3. Changes have been implemented to the T-1 HASP. These changes include: a new Activity Hazard Analysis to address asbestos hazards and work controls to ensure worker safety and additional training requirements for personnel likely to contact asbestos containing material.
4. All material in contact with potentially asbestos containing wastes will be handled in accordance with the asbestos regulations.

J.E. Law  
August 13, 1998  
WRS-053-98  
Page 2

5. We have consulted with RMRS Health and Safety, as well as Linda Guinn, RMRS Corporate Counsel, and have verified that project personnel training and project procedures meet the requirements of 29CFR1926.1101.
6. Changes to the HSP, waste management practices, analytical results and necessary work revisions will be reviewed with the project team prior to commencing work.

Approved



John E. Law, P.E.  
Director  
Environmental Restoration Projects

wrs

cc:  
RMRS Records  
M. Burmeister  
F. Hughes  
R. Wagner

Closeout Report for the Source Removal  
at the Trench 1 Site IHSS 108

Document Number.: RF/RMRS-99-302.UN  
Revision: 0  
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Appendix B  
Results of Air Monitoring Program at T-1

## TRENCH 1 AMBIENT AIR MONITORING RESULTS

### Background

An enhanced, project-specific ambient air monitoring program was implemented during excavation, segregation, sampling, and inerting of depleted uranium chips and associated soils and wastes at T-1, IHSS 108. The ambient air monitoring was performed to ensure that the potential radionuclide emissions from the T-1 source removal project did not exceed the Site 10 millirem (mrem) per year public dose standard specified in Title 40 of the Code of Federal Regulations (CFR), Part 61, Subpart H, Section 61.92.

In relation to the 10 mrem standard in 40 CFR 61, Subpart H and Department of Energy (DOE) Order 5400.1, the Site maintains an ambient air monitoring program that provides information on a monthly basis about radionuclide concentrations in the air at various locations along the Site perimeter. Additional samplers on-site and community are operated to detect and quantify air concentrations should there be a suspected release.

### Enhanced Air Monitoring Program

The project-specific ambient air monitoring for T-1 consisted of enhanced routine monitoring in the immediate vicinity of the T-1 project using the existing Radioactive Ambient Air Monitoring Program (RAAMP) network at the Site. The existing RAAMP sampling network is shown in Figure 1 relative to the T-1 site. Filters from Samplers S-106, S-107, S-119, and S-121 were changed weekly, screened for gross alpha/beta contamination, and submitted for isotopic analyses. The alpha/beta screening results from the four project-specific RAAMP samplers were compared on a weekly basis to a project-specific threshold and a regulatory-based threshold. The project-specific threshold served to compare the radionuclide emission level during the previous week to the level that would approximate a 1 mrem dose at the Site perimeter if the emissions were to continue at that level for the duration of the T-1 project. The regulatory-based threshold corresponded to a radionuclide emission level during the previous week that would approximate a 5 mrem dose at the Site perimeter if the emissions were to continue at that level for the duration of the project.

To characterize the radionuclide emissions generated by activities conducted inside the temporary structure, three high-volume particulate air samplers were located near the activities with the greatest potential to release radionuclides into the atmosphere. Figure 2 provides a schematic layout of the temporary structure and shows the locations of the three samplers relative to the project activities. Sampler T1-B was located near the trench excavation and was moved as excavation advanced along the trench. Sampler T1-A was located on the sampling and inerting pad (SIP), where depleted uranium chips/turnings and other associated material removed from the trench were inerted and packaged in overpack containers. Sampler T1-C was located near the soil stockpile area where excavated soils were staged.

Samplers T1-A, T1-B, and T1-C operated continuously (24 hours per day, 7 days per week) throughout the trench excavation and material handling activities. The filters from the three air samplers were collected and exchanged approximately two times each week and screened for gross alpha/beta contamination. The filters were composited on a monthly basis for radioisotopic analysis.

An immediate exchange of filters on the samplers inside the structure was required on several occasions due to incidents that had a potential for an unexpected and uncharacterized release of radionuclides during the excavation activities. These filters were screened for gross alpha/beta contamination and submitted for expedited isotopic analysis.

### Air Monitoring Results

Prior to beginning excavation, background levels of radioactive ambient air concentrations were collected over a four-week period from RAAMP Samplers S-106, S-107, S-119, and S-121 and a two-week period for Samplers T1-A, T1-B, and T1-C. Average background levels and average  $\pm$  2 standard deviations

were estimated based on the variability of data collected during these sampling periods.

The time-series chart in Figure 3 for RAAMP Samplers S-106, S-107, S-119, and S-121 shows the radioactive air concentration in picocuries per cubic meter ( $\text{pCi}/\text{m}^3$ ) from the alpha screens to be slightly above background during the T-1 project, but approximately one order of magnitude below the 1 mrem dose to the public threshold.

The graphs in Figures 4, 5, 6, and 7 for Samplers S-106, S-107, S-119, and S-121 show air monitoring isotopic data outside the tent for the entire project period. Plutonium (Pu), americium (Am) and uranium concentrations were observed at typical ambient levels throughout the project.

The time-series charts for Samplers T1-A and T1-B in Figure 8 show the weekly radioactive air concentrations in  $\text{pCi}/\text{m}^3$  from alpha screens remained consistently about one order of magnitude above background, but three to four orders of magnitude below the 1 mrem project threshold concentration during the project. The project threshold concentration was estimated based on emissions modeled using CAP88-PC air dispersion model and the number of drums of depleted uranium removed from the trench each week. The line chart for Sampler T1-C in Figure 8 shows that the weekly radioactive air concentration as determined from alpha screens consistently remained near background during the project.

The samples collected inside the tent were analyzed for isotopic content for the entire project period. The graphs in Figures 9, 10 and 11 for Samplers T1-A, T1-B, and T1-C indicate increased concentrations of depleted uranium in the air inside the tent during the project. The highest concentrations of depleted uranium in the ambient air inside the tent were observed during the excavation and SIP activities. The relative differences in concentrations of U-238 between Samplers T1-A and T1-C vary by a factor of 100, which indicates that the SIP and excavation activities generated the highest concentrations of depleted uranium to the air inside the tent. These data also suggest that the majority of the airborne particles did not mix well or carry far in that environment. Plutonium and Am concentrations were observed at normal ambient levels inside the tent throughout the project.

#### Uranium Hydride ( $\text{UH}_3$ ) Fire

The air filter from Sampler T1-B was changed on 5 August 1998, because of a possible release of  $\text{UH}_3$  that occurred from a small fire during excavation activities. The filter from Sampler T1-B was screened for gross alpha/beta contamination at an on-Site laboratory and submitted to an off-Site laboratory for immediate isotopic analysis for Pu, Am, and tritium (H-3).

The radioactive air concentrations from the alpha screens in the time-series chart in Figure 8 show an elevated activity for sampling period 8/4 to 8/11 for Sampler T1-B. Even though the possible release of  $\text{UH}_3$  generated an increase in radioactive air concentrations inside the temporary structure, the elevated concentration was still approximately three orders of magnitude below the modeled project threshold concentration.

Comparing the isotopic analysis in Figure 12 for Sampler T1-B indicates a ratio of U-234 to U-238 is approximately one, which indicates natural uranium was observed near the trench during the fire, in contrast, (depleted uranium would show a ratio well below one). The isotopic results for Pu, Am-241, and U-235 showed negligible levels for sampling period 8/4 to 8/5.

The H-3 results in Figure 13 show the measured concentration from Sampler T1-B to be approximately two orders of magnitude less than the possible H-3 contribution from cosmogenic airborne radioactivity. "The decay and settling of cosmogenic concentrations of some isotopes in the environment may vary considerably in large part with altitude, and can vary as much as two orders of magnitude. The shorter lived cosmogenic radionuclides usually decay before settling to the earth and entering the ecosphere" (Kathern, 32-33). Even if the cosmogenic concentrations of H-3 in the air could potentially be two orders of magnitude less at ground



level, the H-3 concentration measured at the trench from the UH<sub>3</sub> fire is still insignificant. The background information of cosmogenic radionuclides is published in *Radioactivity in the Environment Sources Distribution, and Surveillance*, by Ronald L. Kathren, copyright 1984.

### **Soil Backfilling**

Backfilling of T-1 was performed using the soil originally excavated from the trench and soil from Investigation Derived Material (IDM) drums. To characterize the radionuclide emissions generated by soil backfilling activities conducted inside the temporary structure, one high-volume particulate air sampler was located near the trench. Sampler T1-B was located near the trench and was moved as backfilling advanced along the trench.

The bar chart for Sampler T1-B in Figure 14 shows the radioactive air concentrations in pCi/m<sup>3</sup> from alpha screens remained consistently about one order of magnitude above background, but five orders of magnitude below the 1 mrem project threshold concentration (average modeled concentration) during the project. The average modeled concentration was estimated based on emissions modeled using CAP88-PC air dispersion model and the number of drums of depleted uranium removed from the trench each week. The bar chart for Sampler T1-B in Figure 14 shows that the radioactive air concentration as determined from alpha screens consistently remained just above background during backfilling.

### **Air Monitoring Conclusion**

The data represented in the two graphs in Figure 15 for the two samplers showing the highest concentrations during the study, Sampler T1-B inside the tent and Sampler S-121 outside, show dramatic differences in relative concentrations of U-234 and U-238. Results of the ambient air measurements inside and outside the T-1 tent structure differ by several orders of magnitude. This behavior suggests that the tent was very effective in attenuating air emissions from the project. Note the relative differences in concentrations of U-234 and U-238, indicating minimal contributions from project-generated depleted uranium to the air concentrations outside the tent.

### **References**

Kathren, Ronald L. *Radioactivity in the Environment Sources Distribution, and Surveillance*. Harwood Academic Publishers, New York, NY. 1984, pp. 32-33.

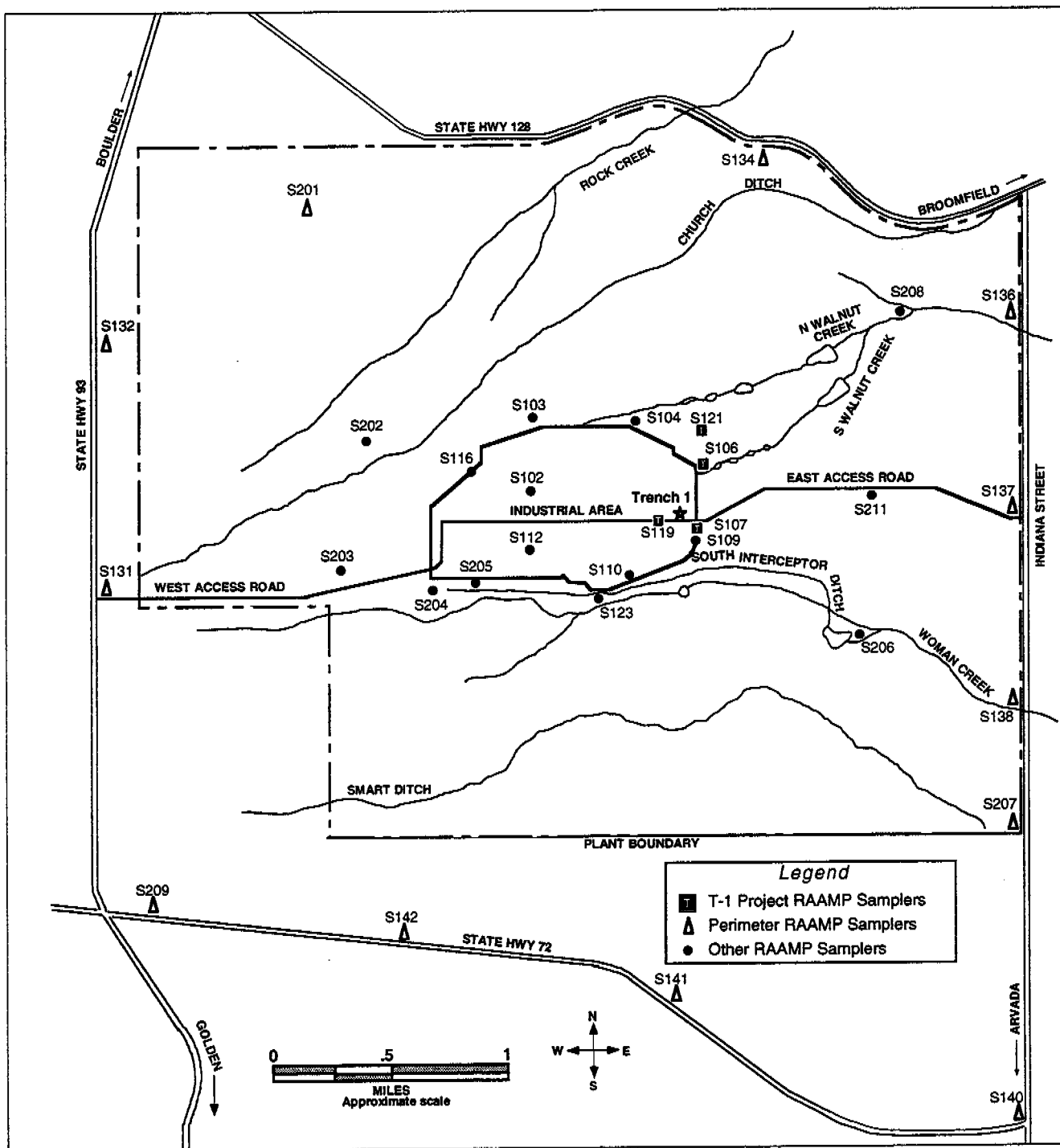


Figure 1. RAAMP Sampler Location Map

# RAAMP Samplers Located Around T-1 Site (Alpha Screens)

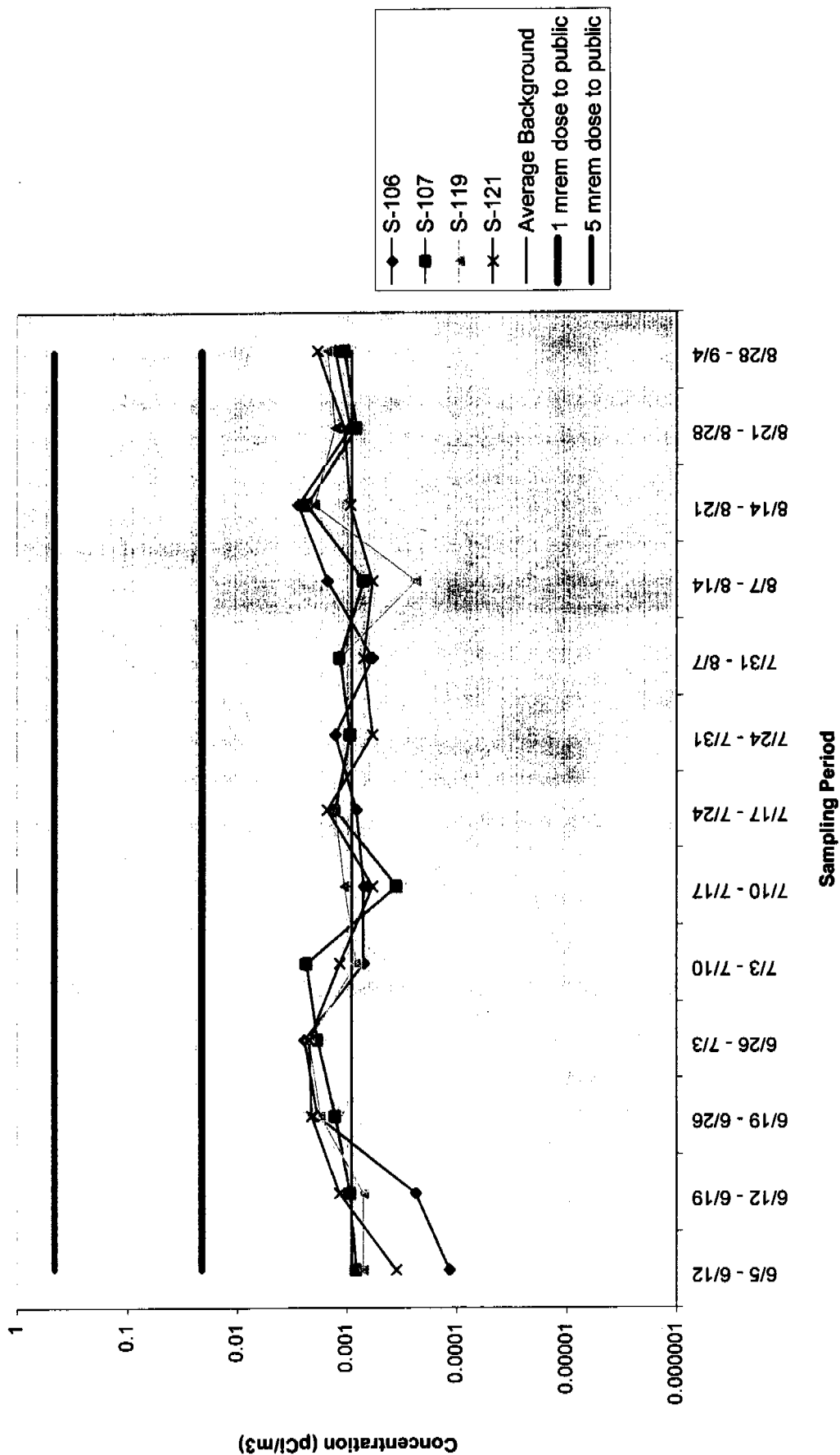
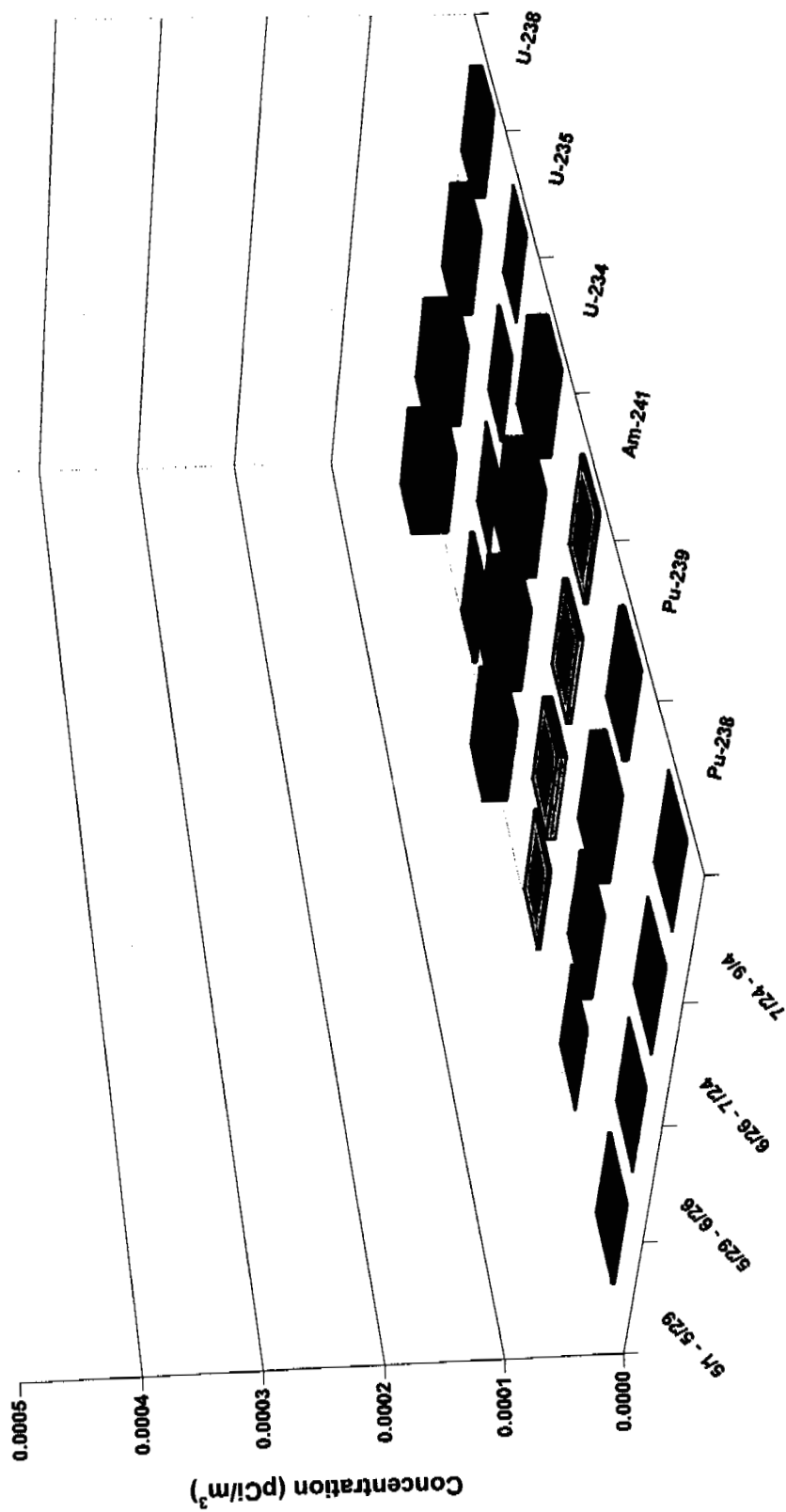


Figure 3

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# Isotopic Results Sampler S-106



Sampling Period

Figure 4

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# Isotopic Results Sampler S-107 (East of 903 Pad)

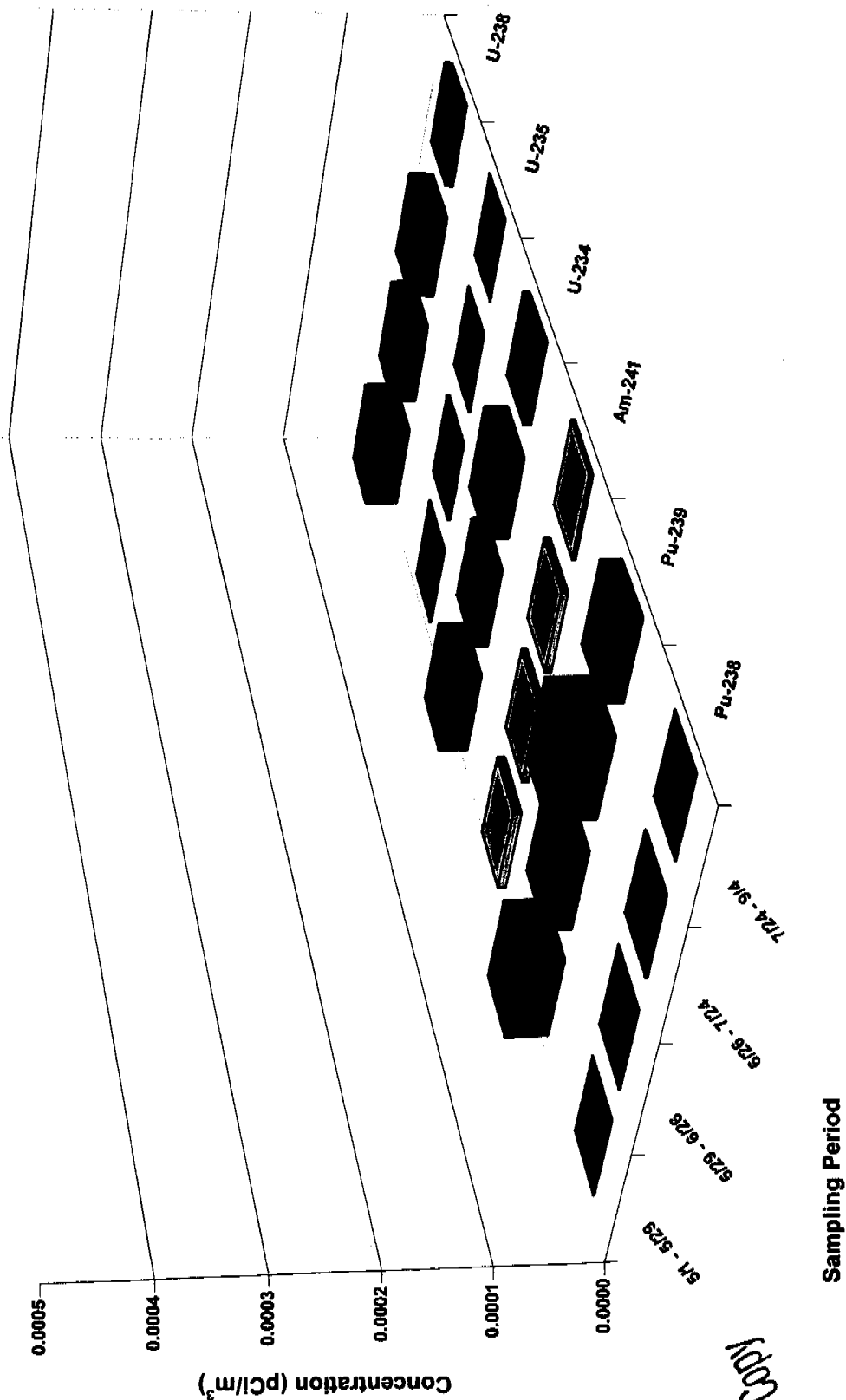


Figure 5

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# Isotopic Results Sampler S-119

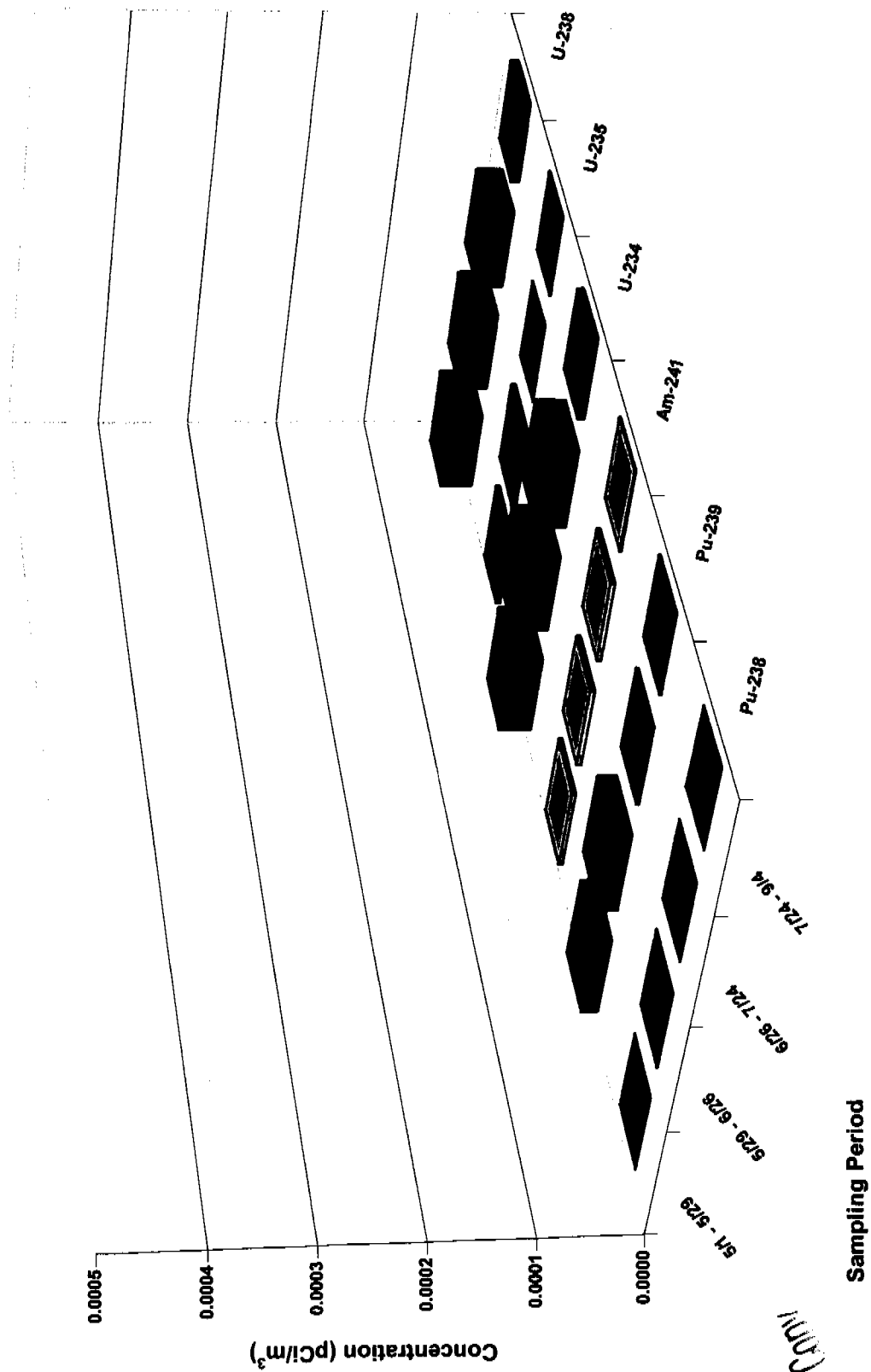


Figure 6

# Isotopic Results Sampler S-121

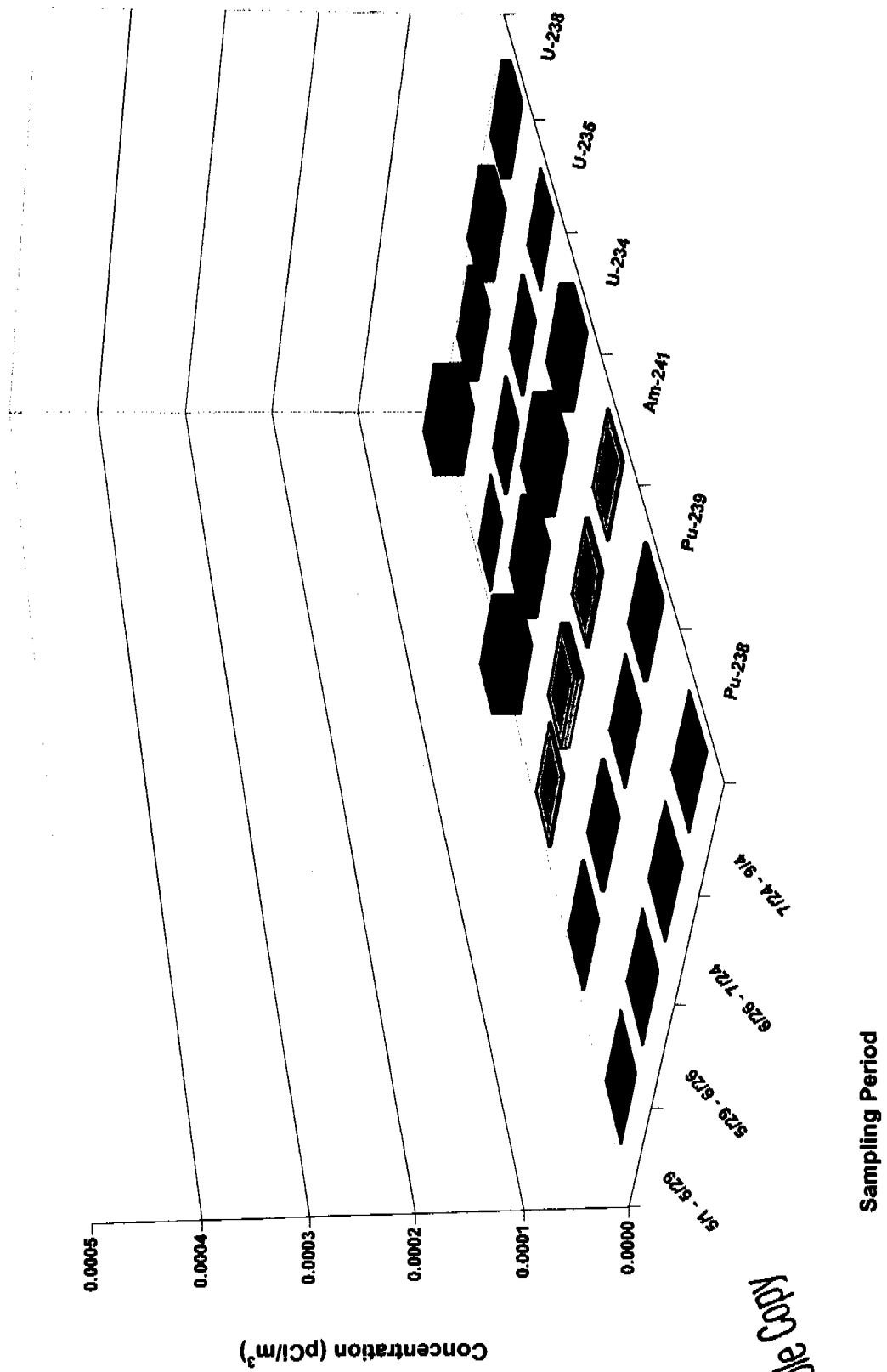
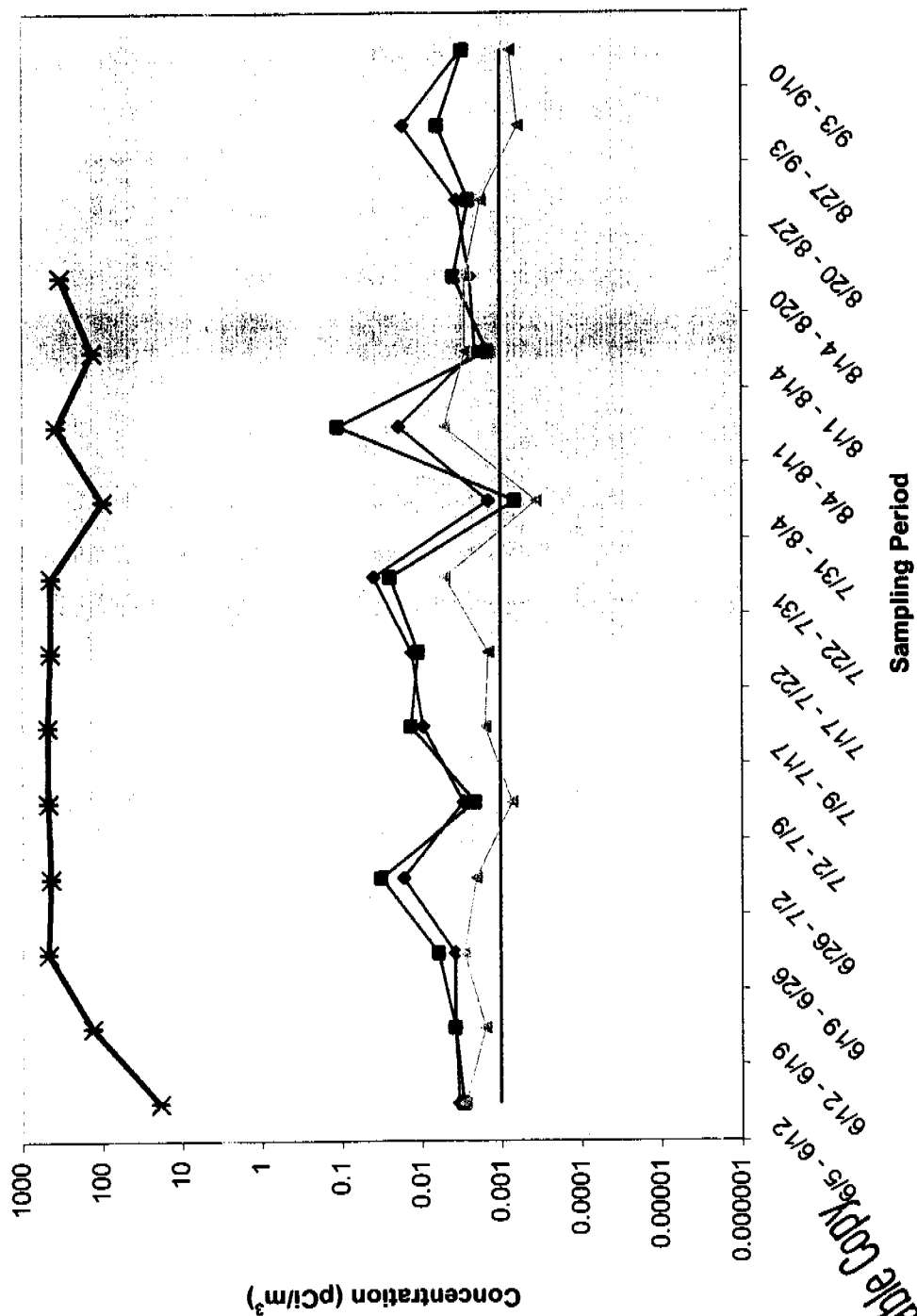


Figure 7

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**Trench 1**  
**Air Samplers Inside Tent T1-A T1-B T1-C**  
**(Alpha Screens)**



Legend:

- T1-A (Alpha Screens)
- T1-B (Alpha Screens)
- T1-C (Alpha Screens)
- T1-A (Background)
- T1-B (Background)

Figure 8



Isotopic Results  
Sampler T1-A (SIP)

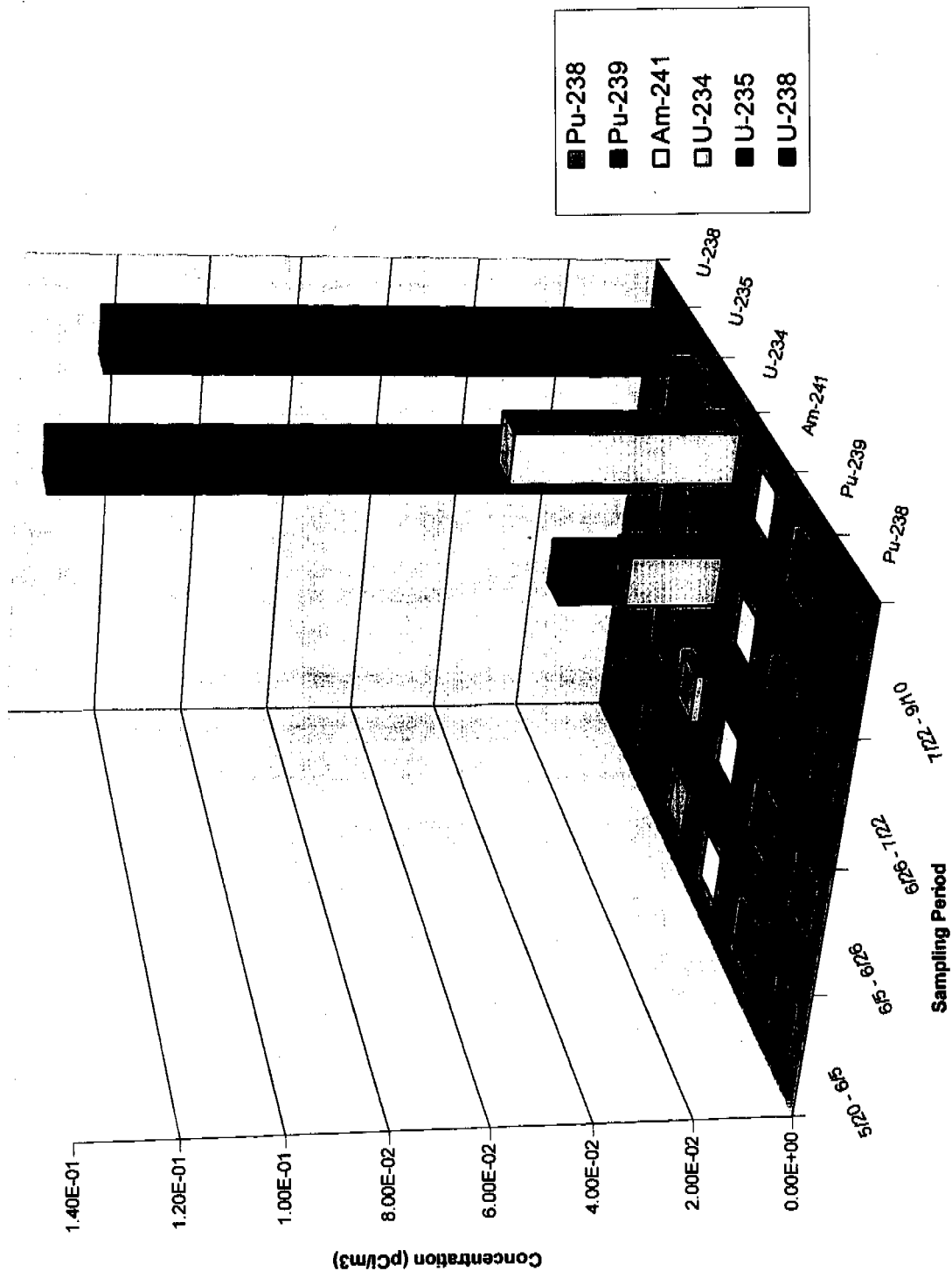


Figure 9

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Isotopic Results  
Sampler T1-B (Trench)

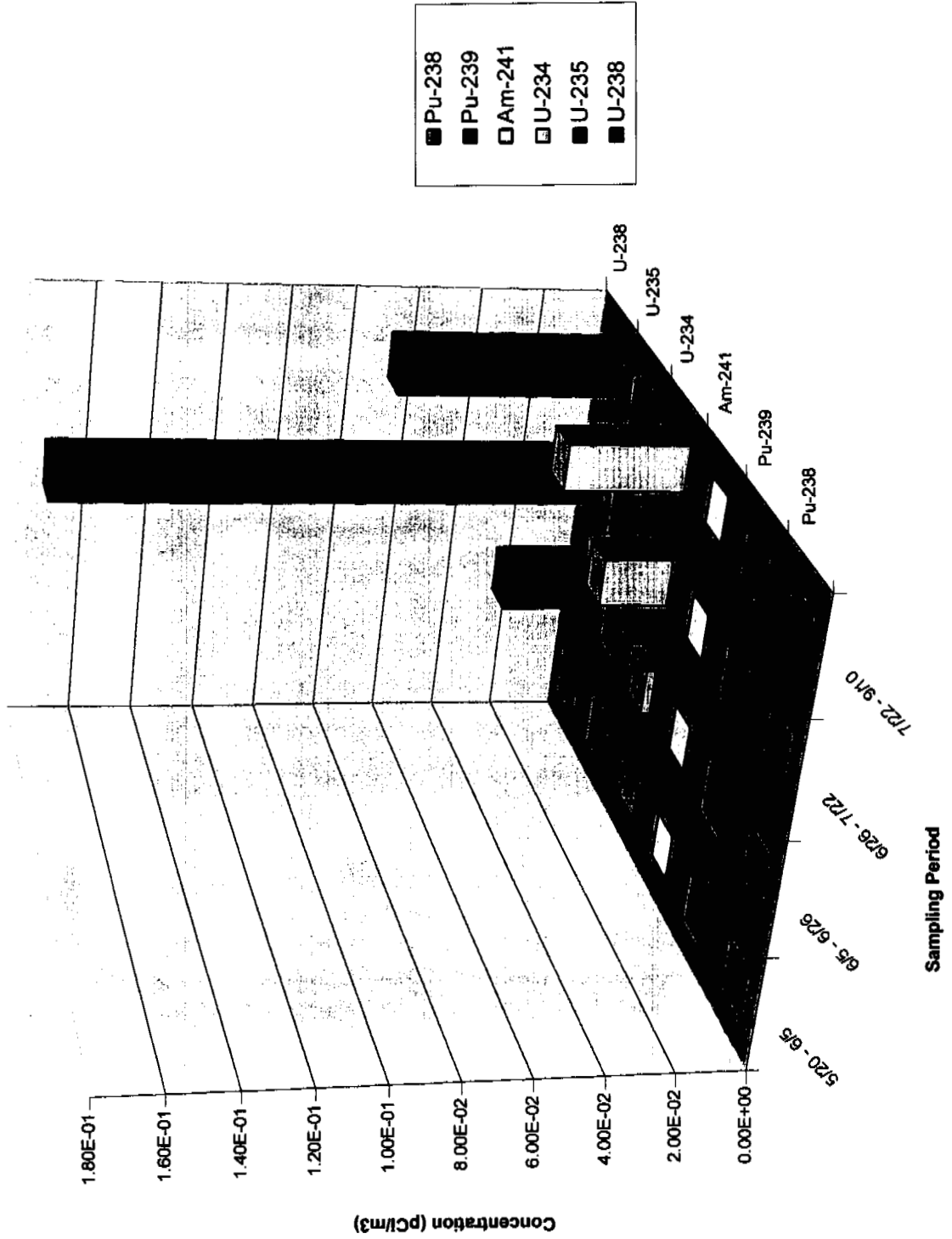


Figure 10

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Isotopic Results  
Sampler T1-C (Stockpile)

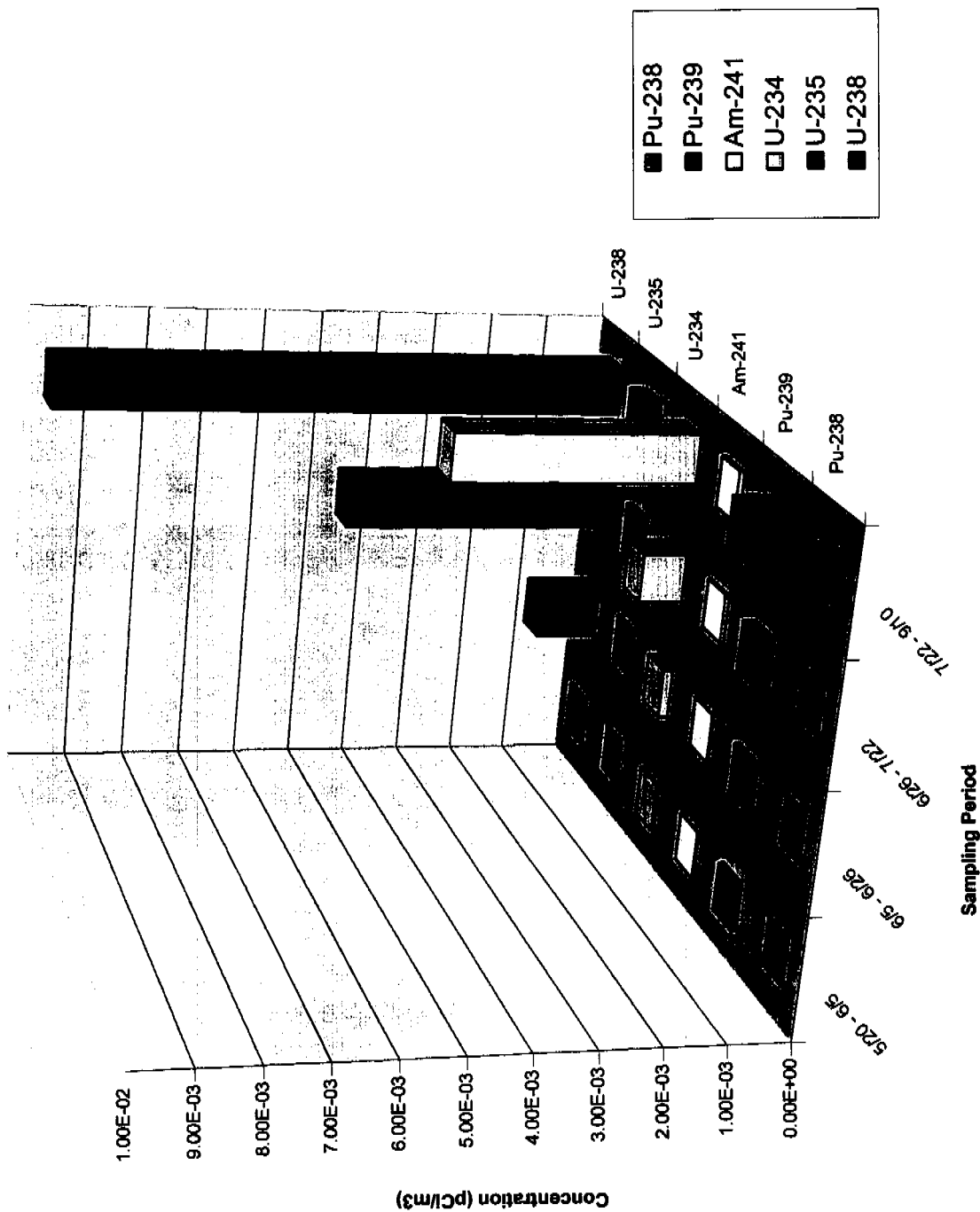


Figure 11

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**Isotopic Results  
Sampler T1-B (Trench)  
UH<sub>3</sub> Fire**

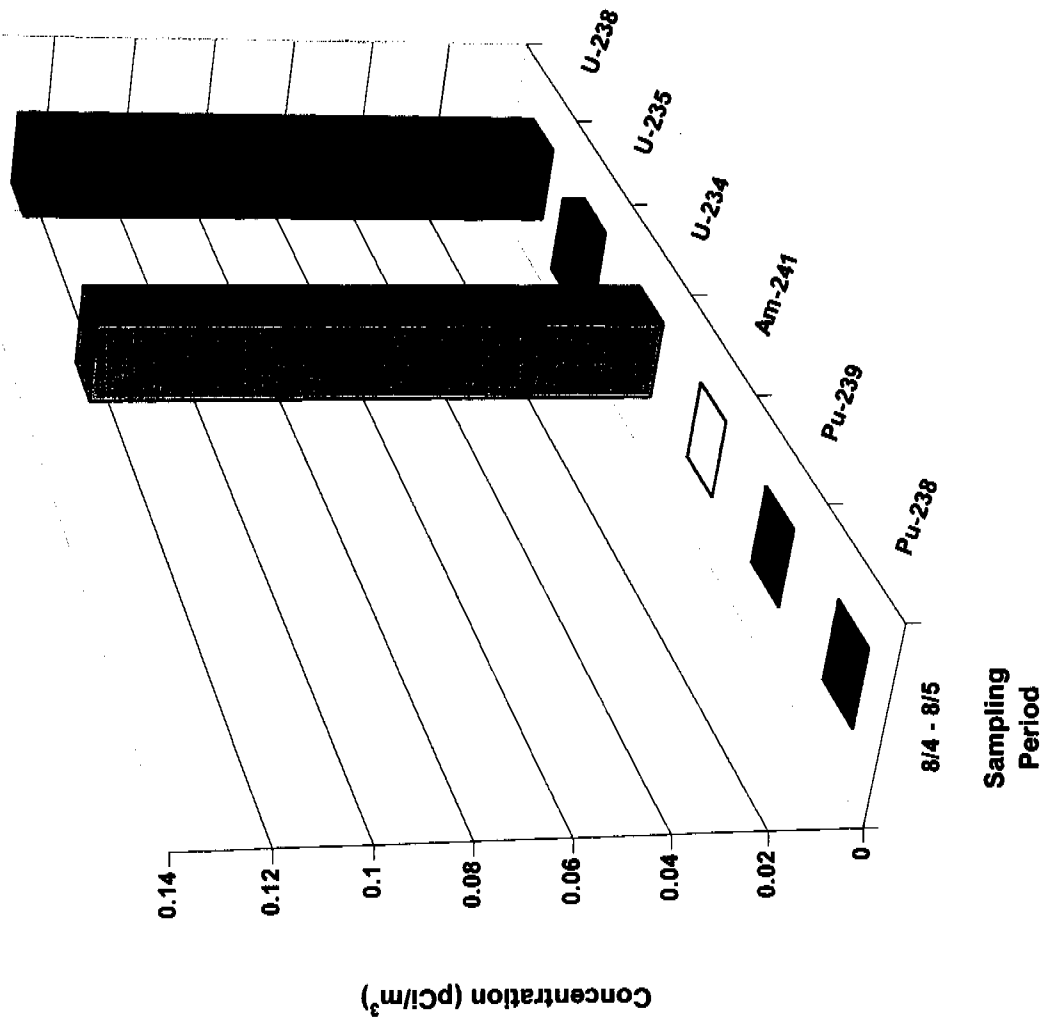
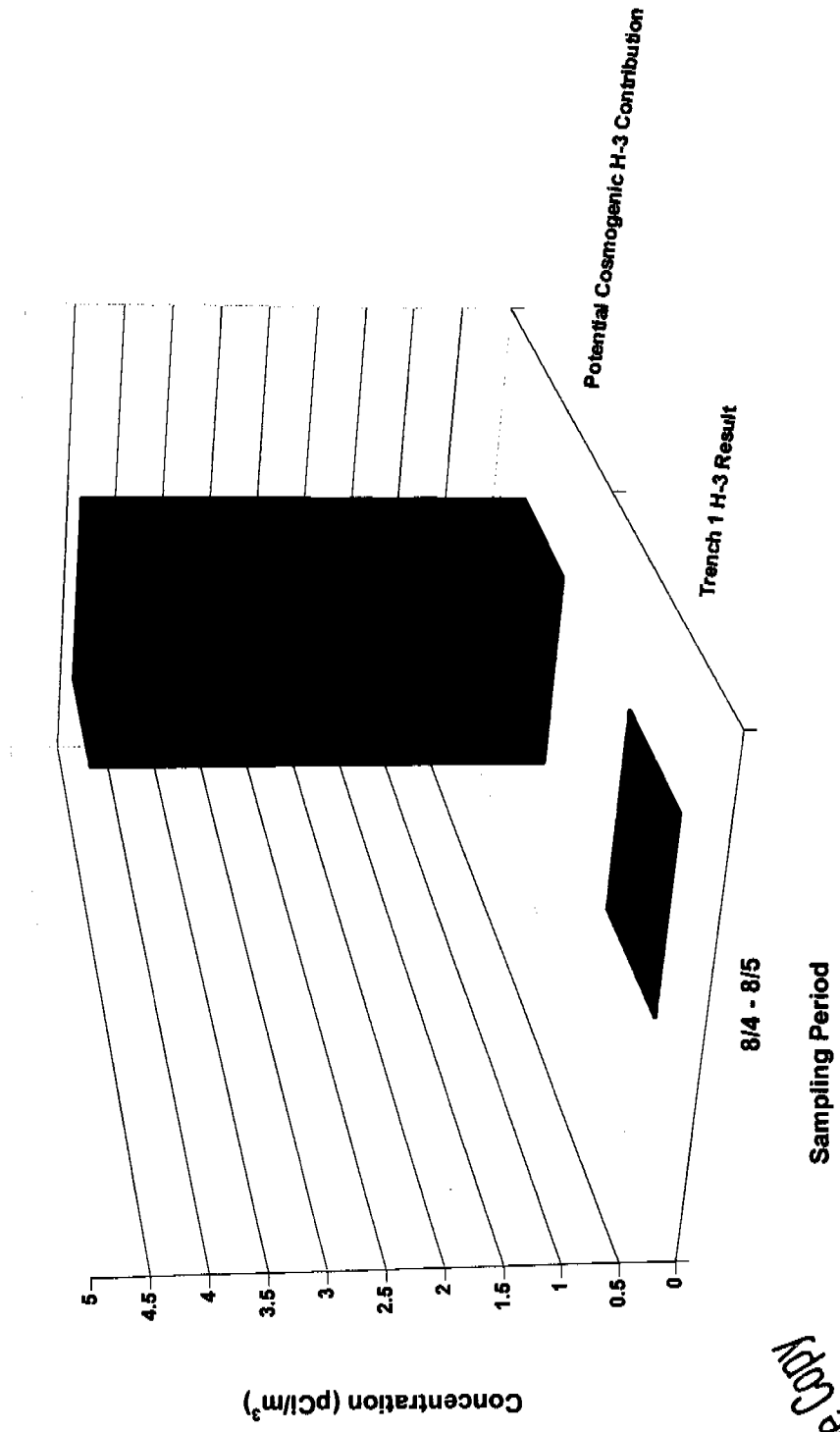


Figure 12

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**Tritium Results  
Sampler T1-B (Trench)  
UH<sub>3</sub> Fire**



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Figure 13

**Trench 1 Backfilling  
Air Sampler T1-B  
(alpha screens)**

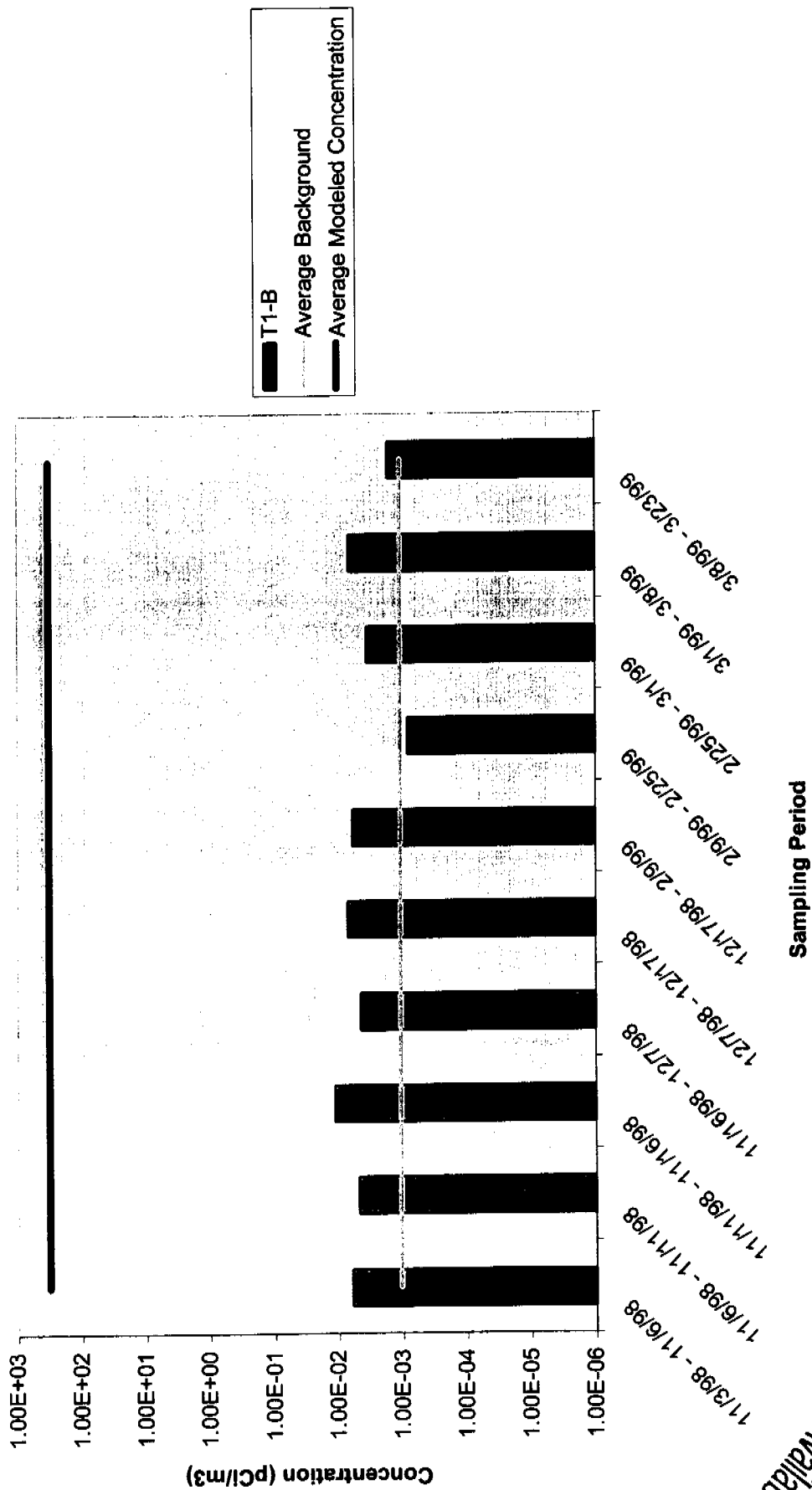
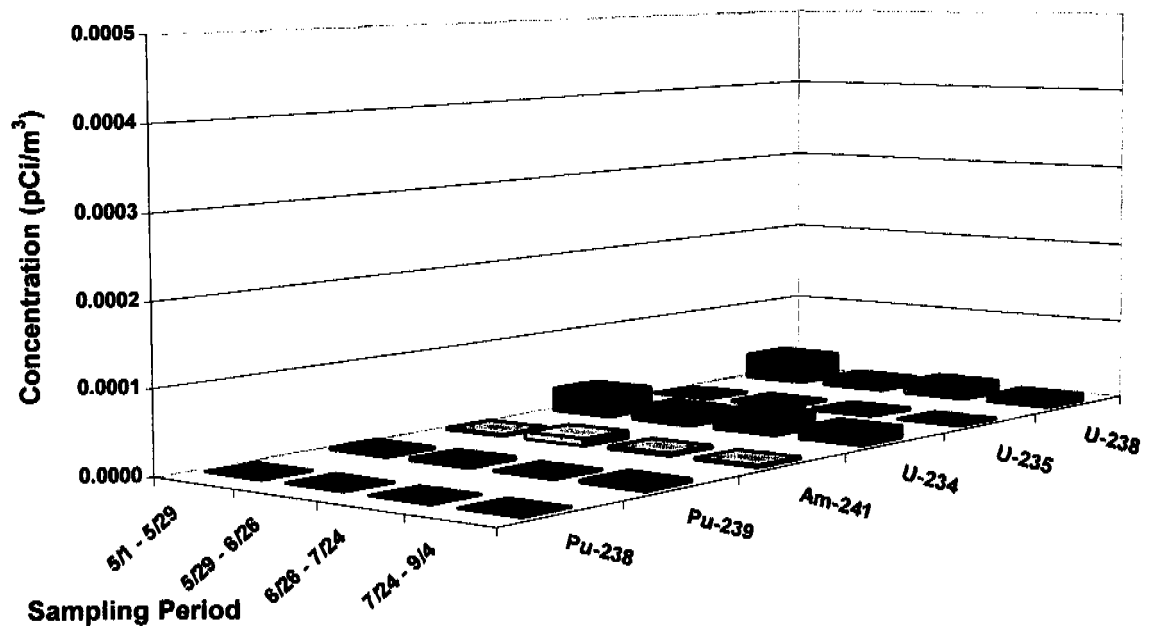


Figure 14

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**Isotopic Results  
Sampler S-121 (Nearby Buffer Zone Sampler)**



**Isotopic Results  
Sampler T1-B (Trench)**

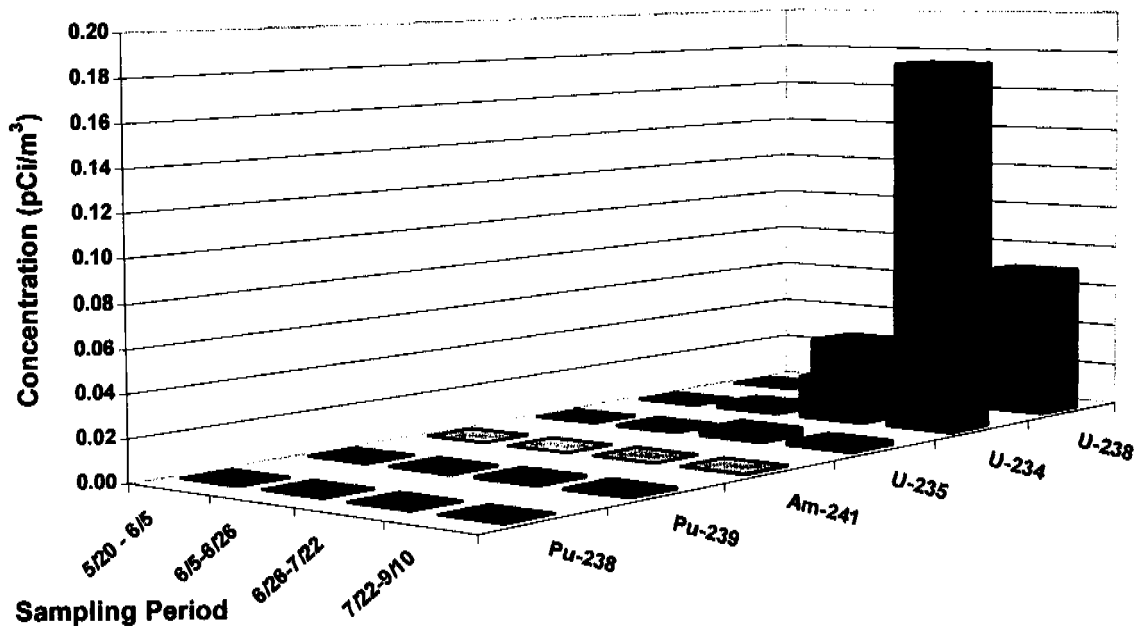


Figure 15

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Closeout Report for the Source Removal  
at the Trench 1 Site IHSS 108

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Appendix C  
Information Regarding Backfilling of T-1  
(Put Back Letters and List of IDM Drums Backfilled in T-1)



## STATE OF COLORADO

Roy Romer, Governor  
Patricia A. Nolan, MD, MPH, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.  
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Laboratory Building  
4210 E. 11th Avenue  
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(303) 691-4700



Colorado Department  
of Public Health  
and Environment

**Howard A. Roitman, Interim Division Director**  
**Hazardous Materials & Waste Management Division**

## FAX TRANSMISSION SHEET

FAX #: 759-5355

IMMEDIATE DELIVERY TO: Gary Kleeman / Norma Castañeda / Tom Greengard / Lane ButlerCOMPANY/AGENCY: EPA / DOE / K-H (SAIC) / K-H

TELEPHONE #: \_\_\_\_\_

TELEFAX #: 312-6067 / 966-4728 / 966-6406 / 966-6406FROM: Carl Spreng

TELEPHONE #: \_\_\_\_\_

SUBJECT: T1 alpha spec analyses (CDPHE lab)

DATE: \_\_\_\_\_

# OF PAGES TO FOLLOW: 1

COMMENTS: Just received these yesterday. Some statistics  
accompanied these data, but we should probably wait  
to apply statistics till all the alpha spec data is in.

| COLORADO DEPT. OF PUBLIC HEALTH & ENVIRONMENT |                                  |          |                   |          |             |                                  |          |                   |          |             |  |
|---|----------------------------------|----------|-------------------|----------|-------------|----------------------------------|----------|-------------------|----------|-------------|--|
| Laboratory and Radiation Services Division    |                                  |          |                   |          |             |                                  |          |                   |          |             |  |
| Radiation Counting Facility                   |                                  |          |                   |          |             |                                  |          |                   |          |             |  |
| Sample  | ALPHA SPECTROMETRIC MEASUREMENTS |          |                   |          |             | GAMMA SPECTROMETRIC MEASUREMENTS |          |                   |          |             |  |
| Number:                                       | <sup>239</sup> Pu                | + 95% CI | <sup>241</sup> Am | + 95% CI | Pu/Am ratio | <sup>239</sup> Pu                | + 95% CI | <sup>241</sup> Am | + 95% CI | Pu/Am ratio |  |
| 2112-002                                      | 1.12                             | 0.09     | 0.17              | 0.06     | 6.6         | 2.66                             |          | 0.60              |          | 4.4         |  |
| 2112-003                                      | 3.49                             | 0.25     | 0.31              | 0.07     | 11.3        | 3.34                             |          | 0.76              |          | 4.4         |  |
| 2112-008                                      | 1.48                             | 0.12     | 0.56              | 0.11     | 2.6         | 5.19                             |          | 1.18              |          | 4.4         |  |
| 2112-014                                      | 11.6                             | 0.5      | 1.95              | 0.02     | 5.9         | 10.52                            |          | 2.39              |          | 4.4         |  |
| 2111-001                                      | <0.08                            |          | <0.08             |          |             | 2.23                             |          | 0.51              |          | 4.4         |  |
| 2111-003                                      | <0.02                            |          | <0.05             |          |             | 2.01                             |          | 0.46              |          | 4.4         |  |
| 2111-011                                      | <0.01                            |          | <0.29             |          |             | 1.93                             |          | 0.44              |          | 4.4         |  |
| 2111-015                                      | 0.03                             | 0.02     | <0.13             |          |             | 2.02                             |          | 0.46              |          | 4.4         |  |
| 2111-016                                      | 0.04                             | 0.02     | <0.04             |          |             | 1.94                             |          | 0.44              |          | 4.4         |  |
| 2111-028                                      | 0.02                             | 0.01     | <0.07             |          |             | 1.78                             |          | 0.40              |          | 4.5         |  |
| 2111-038                                      | 0.02                             | 0.01     | <0.03             |          |             | 1.90                             |          | 0.43              |          | 4.4         |  |
| 2111-045                                      | 0.05                             | 0.01     | <0.07             |          |             | 2.05                             |          | 0.47              |          | 4.4         |  |
| average:                                      |                                  |          |                   |          | 6.6         |                                  |          |                   |          | 4.4         |  |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2456

Ref: EPR-F

DEC 2 1998

Ms. Regina Sarter  
Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

Re: Trench 1 Backfill

Dear Ms. Sarter:

EPA has reviewed the analytical data that were provided on diskettes in order to characterize the contents of the Investigative Derived Material (IDM) which DOE is proposing to use for backfill at Trench 1. This data is correlated to specific drums containing IDM which have been stored for a number of years at the site. The drums shall be emptied so that the contents can be used as backfill for Trench 1 or shipped offsite intact. The data that DOE has provided show that the contents of 2162 drums are acceptable for use as backfill, based on meeting the criteria of Rocky Flats Cleanup Agreement (RFCA) action levels for specific radionuclides and volatile organic compounds in subsurface soils. The specific files that were reviewed and that show detailed correlation of analytical results with drums are:

|              |                           |                    |
|--------------|---------------------------|--------------------|
| IDM3.mdb     | Table: d-pass-both-detail | (977 drums)        |
| IDM4.mdb     | Table: d-pass-rad-detail  | (122 drums)        |
| IDM4.mdb     | Table: d-pass-voc-detail  | (502 drums)        |
| Nov9su~1.xls |                           | (561 drums)        |
|              |                           | (Total 2162 drums) |

In our meeting on November 18, 1998, it was stated that 108 of the 2162 drums were listed more than once in the data tables, so that the total number of unique drums meeting the criteria was 2054. In addition, it was stated that 612 of these drums had already been or will be shipped offsite for disposal, leaving 1442 drums that meet the criteria and will be used as backfill for Trench 1. Since this data was correlated in stages and provided in multiple tables of various formats, EPA repeats its request that DOE provide a summary report of the entire process. This report will enable all parties to track the disposition of these materials with less difficulty and shall list each drum in numerical order for the following categories:

- 1) IDM drums to be used for backfill at Trench 1
- 2) IDM drums already shipped offsite
- 3) IDM drums to be shipped offsite in the future
- 4) IDM drums disqualified from backfill list
- 5) Other IDM drums (drums for which data was not correlated)



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As a result of our independent review of the data provided, EPA approves DOE's request to backfill Trench 1 with the contents of drums that meet the criteria of RFCA subsurface action levels for radionuclides and volatile organic compounds as documented in the files listed above.

EPA has also recently received and reviewed the alpha spectrometry analytical results for radionuclides of samples from the excavation boundaries of Trench 1 (bottom and sidewalls) and its clean soil stockpile. These 29 analyses, in combination with 12 analyses that were performed by the Colorado Department of Public Health and Environment at its Radiation Counting Facility, confirm the results previously obtained by DOE using gamma spectrometry for the same samples. As a result, EPA finds that the Trench 1 excavation boundaries and clean soil stockpile meet RFCA action levels and therefore, DOE may commence backfilling Trench 1 with these soils.

If you have any comments or questions regarding these matters, please contact Gary Kleeman at 312-6246.

Sincerely,



Tim Rehder, Manager  
Rocky Flats Project

cc: Reg Tyler, DOE  
Carl Spreng, CDPHE  
Lane Butler, Kaiser-Hill  
Dave Shelton, Kaiser-Hill



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**Department of Energy**

ROCKY FLATS FIELD OFFICE  
P.O. BOX 928  
GOLDEN, COLORADO 80402-0928

DEC 7 1998

98-DOE-03881

Mr. Tim Rehder  
U.S. Environmental Protection Agency, Region VIII  
999 18<sup>th</sup> Street, Suite 500 8EPR-FT  
Denver, Colorado 80202-2466

Mr. Steve Gunderson  
Colorado Department of Public Health and the Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Gentlemen:

As was recently discussed with you, the U.S. Department of Energy (DOE) Rocky Flats Field Office intends to make a field modification to the Trench 1 work. The Proposed Action Memorandum for Trench 1 states the trench will be backfilled with excavated material that has radionuclide activity levels below Rocky Flats Cleanup Agreement Tier II action levels and with volatile organic chemicals below Tier I. With your agreement, DOE has directed its contractor to backfill the trench with investigative derived material soils that meet these criteria. This action does not compromise safety or protection of public health or the environment. The analytical and radiochemistry results data provided to your agencies to date are acceptable for "put-back" into Trench 1. This field modification will be documented in the Trench 1 Closeout Report.

If you should have any technical questions regarding this transmittal, please contact Norma I. Castaneda at (303) 966-4226 or contact me at (303) 966-5918.

Sincerely,

A handwritten signature in black ink, which appears to read "Joseph A. Legare".

Joseph A. Legare  
RFCA Project Coordinator

**RFETS IDM Drums Listed by WEMS Number Used as Backfill at Trench-1 (11/3/98 - 12/15/98)**

|        |        |        |        |        |        |        |        |        |
|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| E00065 | E00051 | E02572 | E00100 | E02084 | E03079 | E00058 | E02576 | E04568 |
| E00093 | E00056 | E02582 | E00104 | E02093 | E03083 | E00092 | E02643 | E04581 |
| E00095 | E00059 | E02646 | E00105 | E02097 | E03135 | E00126 | E02663 | E04607 |
| E00101 | E00063 | E02750 | E00111 | E02106 | E03136 | E00128 | E02677 | E00009 |
| E00102 | E00094 | E02808 | E00113 | E02109 | E03149 | E00209 | E02714 | E00013 |
| E00114 | E00097 | E02809 | E00133 | E02118 | E03458 | E00266 | E02717 | E00033 |
| E00117 | E00098 | E02899 | E00134 | E02178 | E03693 | E00346 | E02720 | E00045 |
| E00124 | E00106 | E02983 | E00135 | E02187 | E03840 | E00348 | E02721 | E00047 |
| E00125 | E00118 | E03077 | E00136 | E02189 | E04169 | E00355 | E02806 | E00112 |
| E00127 | E00343 | E03081 | E00224 | E02195 | E04177 | E00357 | E02860 | E00159 |
| E00137 | E00379 | E03088 | E00225 | E02200 | E04196 | E00364 | E02878 | E00160 |
| E00229 | E00411 | E03137 | E00230 | E02219 | E04204 | E00501 | E02884 | E00189 |
| E00353 | E00656 | E03138 | E00304 | E02220 | E04209 | E00689 | E03000 | E00198 |
| E00392 | E00658 | E03158 | E00330 | E02221 | E04290 | E00699 | E03003 | E00232 |
| E00410 | E00668 | E03163 | E00344 | E02367 | E04367 | E00707 | E03004 | E00435 |
| E00787 | E00670 | E03342 | E00345 | E02371 | E04401 | E00709 | E03006 | E00688 |
| E00987 | E00681 | E03369 | E00349 | E02391 | E04430 | E00711 | E03062 | E00701 |
| E01428 | E00704 | E04167 | E00351 | E02392 | E04445 | E00716 | E03063 | E00721 |
| E01996 | E00706 | E04175 | E00365 | E02494 | E04448 | E00717 | E03070 | E01557 |
| E01998 | E00713 | E04285 | E00386 | E02512 | E04452 | E01015 | E03090 | E01565 |
| E02184 | E00719 | E04286 | E00408 | E02527 | E04453 | E01045 | E03133 | E01692 |
| E02384 | E00720 | E04289 | E00652 | E02537 | E04457 | E01261 | E03134 | E01716 |
| E02598 | E00730 | E04291 | E00659 | E02566 | E04458 | E01555 | E03144 | E01999 |
| E02686 | E00752 | E04359 | E00675 | E02569 | E04459 | E01560 | E03145 | E02044 |
| E02723 | E00801 | E04441 | E00680 | E02574 | E04461 | E01566 | E03146 | E02054 |
| E02749 | E00874 | E04442 | E00693 | E02575 | E04467 | E01717 | E03147 | E02067 |
| E02763 | E01243 | E04444 | E00695 | E02580 | E04468 | E02058 | E03148 | E02114 |
| E02882 | E01434 | E04455 | E00698 | E02599 | E04477 | E02061 | E03151 | E02202 |
| E02901 | E01435 | E04490 | E00700 | E02637 | E04478 | E02105 | E03162 | E02204 |
| E02985 | E01997 | E04492 | E00714 | E02644 | E04480 | E02119 | E03490 | E02205 |
| E02987 | E02038 | E04493 | E00715 | E02645 | E04489 | E02201 | E03695 | E02389 |
| E02990 | E02062 | E04496 | E00739 | E02647 | E04494 | E02203 | E03698 | E02393 |
| E03082 | E02071 | E04502 | E00788 | E02665 | E04495 | E02368 | E03746 | E02409 |
| E03343 | E02098 | E04504 | E00789 | E02679 | E04499 | E02375 | E03841 | E02411 |
| E03694 | E02107 | E04512 | E00791 | E02715 | E04500 | E02390 | E03842 | E02420 |
| E03696 | E02181 | E04552 | E00875 | E02718 | E04501 | E02402 | E03894 | E02429 |
| E03697 | E02183 | E04560 | E00876 | E02719 | E04509 | E02410 | E04143 | E02433 |
| E03700 | E02185 | E04562 | E00984 | E02722 | E04510 | E02415 | E04368 | E02434 |
| E04184 | E02186 | E04563 | E00985 | E02726 | E04513 | E02421 | E04383 | E02435 |
| E04194 | E02188 | E04566 | E01244 | E02752 | E04524 | E02430 | E04404 | E02437 |
| E04287 | E02190 | E04598 | E01688 | E02798 | E04564 | E02438 | E04425 | E02440 |
| E04288 | E02192 | E04606 | E01991 | E02800 | E04580 | E02446 | E04446 | E02442 |
| E04314 | E02194 | E00011 | E02009 | E02807 | E04599 | E02455 | E04447 | E02448 |
| E04460 | E02351 | E00029 | E02034 | E02879 | E04601 | E02483 | E04449 | E02458 |
| E00002 | E02363 | E00034 | E02046 | E02891 | E04602 | E02508 | E04454 | E02462 |
| E00027 | E02383 | E00036 | E02049 | E02892 | E04608 | E02509 | E04470 | E02480 |
| E00028 | E02386 | E00041 | E02060 | E02898 | E00030 | E02513 | E04472 | E02481 |
| E00031 | E02496 | E00043 | E02064 | E02900 | E00035 | E02535 | E04475 | E02486 |
| E00032 | E02533 | E00057 | E02069 | E02996 | E00049 | E02536 | E04476 | E02488 |
| E00044 | E02568 | E00062 | E02070 | E03059 | E00054 | E02573 | E04565 | E02491 |

**RFETS IDM Drums Listed by WEMS Number Used as Backfill at Trench-1 (11/3/98 - 12/15/98)**

|        |        |        |        |        |        |        |        |        |
|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| E02499 | E03653 | E00795 | E02485 | E03874 | E00213 | E00676 | E02959 | E04299 |
| E02504 | E03740 | E00796 | E02487 | E03875 | E00233 | E00907 | E02961 | E04320 |
| E02505 | E03752 | E00797 | E02502 | E03887 | E00234 | E00915 | E02963 | E04639 |
| E02515 | E03888 | E00798 | E02503 | E03893 | E00246 | E00921 | E02964 | E00085 |
| E02519 | E03889 | E00800 | E02526 | E03895 | E00261 | E00923 | E03010 | E00398 |
| E02522 | E03892 | E00852 | E02528 | E04166 | E00264 | E00924 | E03030 | E00409 |
| E02524 | E04144 | E00853 | E02530 | E04168 | E00265 | E00944 | E03096 | E00415 |
| E02529 | E04178 | E00871 | E02571 | E04280 | E00269 | E01063 | E03103 | E00684 |
| E02531 | E04179 | E00888 | E02636 | E04363 | E00271 | E01102 | E03107 | E00913 |
| E02579 | E04180 | E01016 | E02640 | E04466 | E00272 | E01135 | E03112 | E00922 |
| E02586 | E04181 | E01023 | E02641 | E04473 | E00274 | E01138 | E03141 | E00952 |
| E02600 | E04182 | E01025 | E02649 | E00108 | E00277 | E01168 | E03307 | E00972 |
| E02635 | E04183 | E01036 | E02658 | E00109 | E00103 | E01191 | E03308 | E00974 |
| E02642 | E04185 | E01042 | E02660 | E00116 | E00175 | E01196 | E03346 | E01064 |
| E02648 | E04186 | E01043 | E02666 | E00158 | E00205 | E01208 | E03423 | E01067 |
| E02655 | E04187 | E01044 | E02676 | E00166 | E00096 | E01212 | E03429 | E01068 |
| E02659 | E04188 | E01056 | E02687 | E00207 | E00110 | E01217 | E03444 | E01080 |
| E02664 | E04189 | E01057 | E02705 | E00208 | E00122 | E01220 | E03447 | E01100 |
| E02669 | E04190 | E01059 | E02716 | E00214 | E00129 | E01222 | E03452 | E01104 |
| E02672 | E04191 | E01227 | E02728 | E00217 | E00171 | E01235 | E03500 | E01140 |
| E02690 | E04192 | E01228 | E02729 | E00227 | E00184 | E01236 | E03520 | E01150 |
| E02694 | E04193 | E01242 | E02980 | E0237  | E00187 | E01237 | E03521 | E01167 |
| E02710 | E04205 | E01260 | E02981 | E00250 | E00188 | E01245 | E03560 | E01173 |
| E02712 | E04210 | E01262 | E02982 | E00263 | E00212 | E01246 | E03566 | E01174 |
| E02732 | E04213 | E01433 | E02984 | E00793 | E00221 | E01247 | E03601 | E01178 |
| E02733 | E04214 | E01438 | E02986 | E00799 | E00226 | E01248 | E03612 | E01189 |
| E02734 | E04279 | E01444 | E02988 | E00815 | E00228 | E01265 | E03613 | E01190 |
| E02802 | E04356 | E01467 | E02989 | E00870 | E00251 | E01266 | E03614 | E01195 |
| E02859 | E04358 | E01468 | E02991 | E01019 | E00255 | E01437 | E03638 | E01196 |
| E02877 | E04360 | E01469 | E02994 | E01037 | E00276 | E01664 | E03671 | E01199 |
| E02997 | E04443 | E01492 | E03058 | E01241 | E00284 | E01684 | E03672 | E01211 |
| E02998 | E00001 | E01536 | E03078 | E01426 | E00025 | E01748 | E03681 | E01268 |
| E03001 | E00018 | E01556 | E03084 | E01427 | E00216 | E02077 | E03687 | E01283 |
| E03005 | E00153 | E01562 | E03143 | E01439 | E00223 | E02128 | E03709 | E01316 |
| E03057 | E00154 | E01642 | E03457 | E01466 | E00243 | E02132 | E04021 | E01646 |
| E03080 | E00155 | E01677 | E03488 | E01491 | E00247 | E02364 | E04040 | E01714 |
| E03086 | E00161 | E01698 | E03495 | E02000 | E00254 | E02379 | E04042 | E01737 |
| E03089 | E00168 | E01724 | E03504 | E02042 | E00270 | E02399 | E04147 | E01807 |
| E03142 | E00169 | E01728 | E03506 | E02584 | E00139 | E02400 | E04151 | E02116 |
| E03171 | E00170 | E01739 | E03512 | E03871 | E02082 | E02482 | E04160 | E02134 |
| E03392 | E00197 | E01745 | E03513 | E03886 | E00199 | E02493 | E04170 | E02146 |
| E03473 | E00231 | E01750 | E03514 | E03890 | E00292 | E02517 | E04195 | E02148 |
| E03475 | E00235 | E01779 | E03515 | E03891 | E00298 | E02520 | E04221 | E02150 |
| E03493 | E00238 | E01781 | E03549 | E00099 | E00329 | E02759 | E04240 | E02152 |
| E03497 | E00444 | E01912 | E03702 | E00115 | E00332 | E02767 | E04256 | E02362 |
| E03498 | E00576 | E02095 | E03741 | E00183 | E00336 | E02782 | E04270 | E02450 |
| E03499 | E00753 | E02380 | E03745 | E00203 | E00394 | E02783 | E04272 | E02498 |
| E03502 | E00759 | E02439 | E03870 | E00204 | E00400 | E02784 | E04273 | E02521 |
| E03505 | E00774 | E02461 | E03872 | E00206 | E00401 | E02841 | E04281 | E02523 |
| E03507 | E00775 | E02484 | E03873 | E00211 | E00403 | E02955 | E04297 | E02534 |

**RFETS IDM Drums Listed by WEMS Number Used as Backfill at Trench-1 (11/3/98 - 12/15/98)**

|        |        |        |        |        |        |        |        |        |
|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| E02539 | E00370 | E02793 | E00491 | E03509 | E01183 | E04634 | E00911 | E02699 |
| E02668 | E00371 | E02801 | E00654 | E03510 | E01184 | E04640 | E00912 | E02753 |
| E02707 | E00372 | E02812 | E00673 | E03511 | E01194 | E00067 | E00914 | E02774 |
| E02713 | E00397 | E02958 | E00677 | E03516 | E01206 | E00086 | E00937 | E02781 |
| E02814 | E00904 | E02962 | E00679 | E03517 | E01218 | E00201 | E00943 | E02796 |
| E02954 | E00906 | E02993 | E00900 | E03525 | E01240 | E00202 | E00946 | E02803 |
| E02957 | E00908 | E03013 | E00902 | E03528 | E01249 | E00249 | E00951 | E02813 |
| E02965 | E00910 | E03022 | E00919 | E03686 | E01288 | E00841 | E00966 | E02833 |
| E02976 | E00916 | E03068 | E00920 | E03699 | E01304 | E00885 | E00969 | E02837 |
| E02977 | E00917 | E03099 | E00926 | E03851 | E01672 | E01027 | E00973 | E02842 |
| E03007 | E00918 | E03109 | E00928 | E03855 | E01683 | E02126 | E00978 | E02843 |
| E03020 | E00925 | E03460 | E00940 | E03857 | E01693 | E02575 | E01028 | E02845 |
| E03097 | E00927 | E03461 | E00942 | E03863 | E01993 | E02587 | E01030 | E02852 |
| E03098 | E00929 | E03478 | E00950 | E03865 | E01995 | E03405 | E01034 | E03218 |
| E03100 | E00954 | E03519 | E01070 | E04043 | E02013 | E03433 | E01035 | E03266 |
| E03104 | E00958 | E03522 | E01072 | E04048 | E02078 | E03438 | E01047 | E03345 |
| E03106 | E00962 | E03534 | E01086 | E04050 | E02079 | E03439 | E01049 | E03422 |
| E03114 | E00965 | E03676 | E01141 | E04059 | E02138 | E03445 | E01050 | E03428 |
| E03121 | E01051 | E03678 | E01144 | E04062 | E02516 | E03446 | E01078 | E03440 |
| E03122 | E01054 | E03701 | E01146 | E04137 | E03008 | E03451 | E01081 | E03527 |
| E03124 | E01075 | E03718 | E01161 | E04271 | E03154 | E03453 | E01097 | E03535 |
| E03367 | E01076 | E03722 | E01180 | E04309 | E03268 | E03455 | E01137 | E03569 |
| E03368 | E01093 | E03723 | E01182 | E04310 | E03269 | E03600 | E01139 | E03586 |
| E03403 | E01101 | E03847 | E01186 | E04321 | E03302 | E03670 | E01142 | E03587 |
| E03434 | E01103 | E03848 | E01197 | E00260 | E03304 | E03716 | E01155 | E03588 |
| E03448 | E01136 | E03859 | E01202 | E00279 | E03309 | E03719 | E01162 | E03607 |
| E03449 | E01147 | E03860 | E01213 | E00323 | E03397 | E03720 | E01165 | E03608 |
| E03450 | E01153 | E03864 | E01214 | E00339 | E03401 | E03763 | E01169 | E03615 |
| E03561 | E01154 | E03876 | E01215 | E00381 | E03408 | E04308 | E01170 | E03622 |
| E03564 | E01159 | E03975 | E01321 | E00419 | E03431 | E04349 | E01172 | E03635 |
| E03602 | E01163 | E03976 | E01518 | E00682 | E03443 | E04352 | E01185 | E03688 |
| E03849 | E01179 | E04008 | E01804 | E00903 | E03523 | E00119 | E01198 | E03710 |
| E03858 | E01187 | E04009 | E01806 | E00905 | E03524 | E00313 | E01200 | E03721 |
| E03941 | E01201 | E04053 | E02139 | E00909 | E03526 | E00317 | E01203 | E03724 |
| E04007 | E01204 | E04135 | E02725 | E01026 | E03536 | E00334 | E01219 | E03854 |
| E04022 | E01221 | E04150 | E02756 | E01033 | E03567 | E00337 | E01230 | E03862 |
| E04024 | E01281 | E04154 | E02758 | E01065 | E03589 | E00341 | E01303 | E03877 |
| E04148 | E01282 | E04159 | E02773 | E01066 | E03717 | E00358 | E01453 | E03978 |
| E04153 | E01285 | E04164 | E02779 | E01069 | E03856 | E00363 | E01666 | E03979 |
| E04155 | E01287 | E04174 | E02785 | E01079 | E04004 | E00373 | E01668 | E03980 |
| E04157 | E01805 | E04211 | E02804 | E01085 | E04006 | E00374 | E01690 | E03981 |
| E04158 | E02017 | E04525 | E02816 | E01094 | E04094 | E00375 | E01691 | E03982 |
| E04161 | E02131 | E04638 | E02834 | E01096 | E04173 | E00378 | E01803 | E03983 |
| E04282 | E02143 | E00319 | E02839 | E01099 | E04301 | E00382 | E02108 | E03984 |
| E04298 | E02149 | E00335 | E02880 | E01143 | E04311 | E00405 | E02125 | E03985 |
| E04350 | E02153 | E00340 | E03002 | E01145 | E04351 | E00406 | E02129 | E04005 |
| E04353 | E02760 | E00342 | E03087 | E01152 | E04617 | E00802 | E02133 | E04061 |
| E00321 | E02762 | E00396 | E03300 | E01171 | E04618 | E00892 | E02191 | E04172 |
| E00359 | E02769 | E00402 | E03344 | E01175 | E04623 | E00899 | E02193 | E04203 |
| E00362 | E02770 | E00420 | E03508 | E01181 | E04624 | E00901 | E02601 | E04296 |



**RFETS IDM Drums Listed by WEMS Number Used as Backfill at Trench-1 (11/3/98 - 12/15/98)**

|        |        |
|--------|--------|
| E04300 | E02940 |
| E04334 | E02941 |
| E04388 | E02942 |
| E04465 | E02943 |
| E04536 | E02944 |
| E04537 | E02945 |
| E04546 | E02973 |
| E00123 | E03281 |
| E00138 | E03282 |
| E00141 | E03283 |
| E00178 | E03325 |
| E00195 | E03326 |
| E00196 | E03327 |
| E00200 | E03329 |
| E00222 | E03330 |
| E00280 | E03331 |
| E00286 | E03336 |
| E00287 | E03338 |
| E00803 | E03339 |
| E00840 | E03407 |
| E00890 | E03421 |
| E01031 | E03438 |
| E01048 | E03454 |
| E01052 | E03465 |
| E01055 | E03565 |
| E01670 | E03577 |
| E01675 | E03579 |
| E02004 | E03611 |
| E02008 | E04171 |
| E02010 | E04312 |
| E02011 | E04335 |
| E02022 | E04336 |
| E02894 | E04347 |
| E02895 | E04545 |

E02896  
E02904

E02922 NOTES: Drum # E02379 was first recorded as dumped on 11/16/98, a drum by the same number was  
E02923 recorded as dumped on 12/3/98. It is assumed that the drum previously dumped on 11/16 was actually  
E02924 drum # E00237

E02925  
E02930  
E02931  
E02932  
E02933  
E02934  
E02935  
E02936  
E02937  
E02938  
E02939

Appendix D  
T-1 Waste Information

- |              |   |
|--------------|---|
| Appendix D-1 | T-1 Waste Container Inventories (including initial and secondary overpack correlations)                                       |
| Appendix D-2 | T-1 Depleted Uranium Gamma Spectroscopy Data, Descriptions of Samples and Radioactive Material Type Determination Spreadsheet |
| Appendix D-3 | T-1 Decanted Lathe Coolant Information  |
| Appendix D-4 | T-1 Cemented Cyanide Reclassification Letter  |

Closeout Report for the Source Removal  
at the Trench 1 Site IHSS 108

Document Number.: RF/RMRS-99-302.UN  
Revision: 0  
Page: Appendices

Appendix D-1  
T-1 Waste Container Inventories  
(including initial and secondary overpack correlations)

## TRENCH 1 WASTE CONTAINERS

| Container Type     | WEM's No. | IDC | Fill (set-up)<br>Date | weight (lbs)<br>prior to<br>inerting | weight (lbs)<br>after<br>inerting | Final<br>Shipping<br>Weight<br>(lbs) | Traveler | Overpack<br>Container No. | Notes  |
|--------------------|-----------|-----|-----------------------|--------------------------------------|-----------------------------------|--------------------------------------|----------|---------------------------|--|
| 55 gallon drum     | D87711    | 325 | 9/8/98                | N/A                                  | N/A                               | 112                                  | yes      | N/A                       | project generated debris, ship to Envirocare                               |
| 55 gallon drum     | D93471    | 483 | 8/3/98                | 223                                  | 544                               | 544                                  | yes      | N/A                       | DU puck inerted with soil  |
| 55 gallon drum     | X07935    | 530 | 07/07/98              | N/A                                  | N/A                               | N/A                                  | yes      | N/A                       | lathe coolant <15 gallons  |
| 83 gallon overpack | X09845    | 483 | 6/25/98               | 1278                                 | 1562                              | NA                                   | yes      | SPECIAL                   | some of the contents from X09845 removed and put into D87705 (SEE X09860). |
| 83 gallon overpack | X09846    | 483 | 7/7/98                | 520                                  | 643                               | 721                                  | yes      | D87702 (55 gal.)          | non-intact   |
| 83 gallon overpack | X09847    | 483 | 7/9/98                | 283                                  | 515                               | 593                                  | yes      | D88411 (55 gal.)          |  |
| 83 gallon overpack | X09848    | 483 | 7/9/98                | 368                                  | 601                               | 679                                  | yes      | D88420 (55 gal.)          |  |
| 83 gallon overpack | X09849    | 483 | 7/8/98                | 304                                  | 574                               | 652                                  | yes      | D88410 (55 gal.)          |  |
| 83 gallon overpack | X09853    | 483 | 6/30/98               | 1204                                 | 1580                              | 1658                                 | yes      | SPECIAL                   | requires overpacking   |
| 83 gallon overpack | X09858    | 483 | 7/9/98                | 288                                  | 550                               | 628                                  | yes      | D88412 (55 gal.)          |  |
| 83 gallon overpack | X09859    | 483 | 7/9/98                | 392                                  | 653                               | 731                                  | yes      | D87710 (55 gal.)          |  |
| 83 gallon overpack | X09860    | 483 | 6/30/98               | 349                                  | 873                               | 951                                  | yes      | D87705 (55 gal.)          | some of the contents from X09845 removed and put into D87705               |
| 83 gallon overpack | X09873    | 483 | 7/9/98                | 531                                  | 657                               | 735                                  | yes      | D88416 (55 gal.)          |  |
| 83 gallon overpack | X09879    | 483 | 6/30/98               | 1270                                 | 1525                              | 1603                                 | yes      | SPECIAL                   | requires overpacking   |
| 83 gallon overpack | X09889    | 483 | 7/9/98                | 440                                  | 592                               | 670                                  | yes      | D88405 (55 gal.)          |  |
| 83 gallon overpack | X09891    | 483 | 7/9/98                | 449                                  | 539                               | 617                                  | yes      | D92861 (55 gal.)          |  |
| 83 gallon overpack | X09892    | 483 | 7/8/98                | 356                                  | 440                               | 518                                  | yes      | D88418 (55 gal.)          |  |
| 83 gallon overpack | X09895    | 483 | 7/22/98               | 330                                  | 593                               | 671                                  | yes      | D93280 (55 gal.)          |  |
| 83 gallon overpack | X09896    | 483 | 7/21/98               | 305                                  | 517                               | 595                                  | yes      | D93275 (55 gal.)          |  |
| 83 gallon overpack | X09897    | 483 | 7/21/98               | 275                                  | 555                               | 633                                  | yes      | D93266 (55 gal.)          |  |
| 83 gallon overpack | X09898    | 483 | 7/20/98               | 401                                  | 486                               | 564                                  | yes      | D93283 (55 gal.)          |  |
| 83 gallon overpack | X09899    | 483 | 7/22/98               | 376                                  | 595                               | 673                                  | yes      | D93261 (55 gal.)          |  |
| 83 gallon overpack | X09900    | 483 | 7/21/98               | 368                                  | 647                               | 725                                  | yes      | D93263 (55 gal.)          |  |
| 83 gallon overpack | X09901    | 483 | 7/21/98               | 319                                  | 476                               | 554                                  | yes      | D93288 (55 gal.)          |  |
| 83 gallon overpack | X09902    | 483 | 7/22/98               | 380                                  | 543                               | 621                                  | yes      |                           | LLM/cemented cyanide/ACM - contaminated PPE and sample equipment           |
| 83 gallon overpack | X09903    | 325 | 8/14/98               | 81                                   | N/A                               | 163                                  | yes      | N/A                       |  |
| 83 gallon overpack | X10875    | 483 | 7/22/98               | 470                                  | N/A                               | 716                                  | yes      | D93286 (55 gal.)          |  |
| 83 gallon overpack | X10876    | 483 | 7/21/98               | 261                                  | 541                               | 619                                  | yes      | D93260 (55 gal.)          |  |
| 83 gallon overpack | X10877    | 483 | 7/22/98               | 297                                  | 525                               | 603                                  | yes      | D93267 (55 gal.)          |  |
| 83 gallon overpack | X10878    | 483 | 7/30/98               | 244                                  | 410                               | 488                                  | yes      | D93457 (55 gal.)          |  |
| 83 gallon overpack | X10879    | 483 | 7/20/98               | 445                                  | 633                               | 711                                  | yes      | D93270 (55 gal.)          |  |
| 83 gallon overpack | X10880    | 483 | 7/21/98               | 305                                  | 460                               | 536                                  | yes      | D93273 (55 gal.)          |  |
| 83 gallon overpack | X10882    | 483 | 7/22/98               | 327                                  | 636                               | 714                                  | yes      | D93284 (55 gal.)          |  |
| 83 gallon overpack | X10883    | 483 | 7/22/98               | 294                                  | 441                               | 519                                  | yes      | D93285 (55 gal.)          |  |
| 83 gallon overpack | X10884    | 483 | 7/21/98               | 427                                  | 549                               | 627                                  | yes      | D93268 (55 gal.)          |  |
| 83 gallon overpack | X10885    | 483 | 7/20/98               | 253                                  | 519                               | 597                                  | yes      | D93274 (55 gal.)          |  |
| 83 gallon overpack | X10886    | 483 | 7/22/98               | 259                                  | 545                               | 623                                  | yes      | D93277 (55 gal.)          |  |
| 83 gallon overpack | X10887    | 483 | 7/22/98               | 314                                  | 427                               | 505                                  | yes      | D93287 (55 gal.)          |  |
| 83 gallon overpack | X10888    | 483 | 7/22/98               | 405                                  | 520                               | 598                                  | yes      | D93271 (55 gal.)          |  |
| 83 gallon overpack | X10889    | 483 | 7/20/98               | 317                                  | 462                               | 540                                  | yes      | D93272 (55 gal.)          |  |
| 83 gallon overpack | X10890    | 483 | 7/21/98               | 554                                  | 616                               | 694                                  | yes      | D93259 (55 gal.)          |  |
| 83 gallon overpack | X10891    | 483 | 7/21/98               | 381                                  | 491                               | 569                                  | yes      | D93282 (55 gal.)          |  |
| 83 gallon overpack | X10892    | 483 | 7/20/98               | 269                                  | 475                               | 553                                  | yes      | D93276 (55 gal.)          |  |

83 GALLON OVERPACKS

6/2/99

## TRENCH 1 WASTE CONTAINERS

| Container Type     | WEM's No. | IDC | Fill (set-up)<br>Date | weight (lbs)<br>prior to<br>Inerting | weight (lbs)<br>after<br>Inerting | Final<br>Shipping<br>Weight<br>(lbs) | Traveler | Overpack<br>Container No. | Notes                                     |
|--------------------|-----------|-----|-----------------------|--------------------------------------|-----------------------------------|--------------------------------------|----------|---------------------------|---|
| 83 gallon overpack | X10893    | 483 | 7/22/98               | 296                                  | 542                               | 620                                  | yes      | D93279 (55 gal.)          |   |
| 83 gallon overpack | X10894    | 483 | 7/21/98               | 368                                  | 613                               | 691                                  | yes      | D93265 (55 gal.)          |   |
| 83 gallon overpack | X10895    | 483 | 7/22/98               | 293                                  | 563                               | 641                                  | yes      | D93278 (55 gal.)          |   |
| 83 gallon overpack | X10896    | 483 | 7/28/98               | 541                                  | 707                               | 785                                  | yes      | D93450 (55 gal.)          |   |
| 83 gallon overpack | X10897    | 483 | 7/21/98               | 346                                  | 618                               | 696                                  | yes      | D92867 (55 gal.)          |   |
| 83 gallon overpack | X10898    | 483 | 7/21/98               | 380                                  | 498                               | 576                                  | yes      | D92856 (55 gal.)          |   |
| 83 gallon overpack | X10899    | 483 | 7/13/98               | 287                                  | 572                               | 650                                  | yes      | D92865 (55 gal.)          |   |
| 83 gallon overpack | X10900    | 483 | 7/14/98               | 338                                  | 577                               | 655                                  | yes      | D92871 (55 gal.)          |   |
| 83 gallon overpack | X10901    | 483 | 7/14/98               | 303                                  | 501                               | 579                                  | yes      | D92866 (55 gal.)          |   |
| 83 gallon overpack | X10902    | 483 | 7/13/98               | 331                                  | 477                               | 555                                  | yes      | D92868 (55 gal.)          |   |
| 83 gallon overpack | X10903    | 483 | 7/14/98               | 525                                  | 658                               | 736                                  | yes      | D92870 (55 gal.)          |   |
| 83 gallon overpack | X10904    | 483 | 8/3/98                | 486                                  | 661                               | 739                                  | yes      | D93469 (55 gal.)          |   |
| 83 gallon overpack | X10905    | 483 | 8/3/98                | 350                                  | 492                               | 570                                  | yes      | D93466 (55 gal.)          |   |
| 83 gallon overpack | X10907    | 483 | 7/30/98               | 463                                  | 595                               | 673                                  | yes      | D93461 (55 gal.)          |   |
| 83 gallon overpack | X10908    | 483 | 7/22/98               | 343                                  | 544                               | 622                                  | yes      | D93462 (55 gal.)          |   |
| 83 gallon overpack | X10909    | 483 | 7/13/98               | 308                                  | 582                               | 660                                  | yes      | D92863 (55 gal.)          | not intact                                |
| 83 gallon overpack | X10911    | 483 | 7/16/98               | 377                                  | 502                               | 580                                  | yes      | D93269 (55 gal.)          |   |
| 83 gallon overpack | X10912    | 483 | 7/16/98               | 340                                  | 580                               | 658                                  | yes      | D93262 (55 gal.)          |   |
| 83 gallon overpack | X10913    | 483 | 7/16/98               | 342                                  | 491                               | 569                                  | yes      | D92852 (55 gal.)          |   |
| 83 gallon overpack | X10914    | 483 | 7/16/98               | 320                                  | 586                               | 664                                  | yes      | D93264 (55 gal.)          |   |
| 83 gallon overpack | X10915    | 483 | 7/13/98               | 585                                  | 733                               | 811                                  | yes      | D92854 (55 gal.)          |   |
| 83 gallon overpack | X10916    | 483 | 7/8/98                | 426                                  | 557                               | 635                                  | yes      | D88407 (55 gal.)          |   |
| 83 gallon overpack | X10917    | 483 | 7/8/98                | 290                                  | 536                               | 614                                  | yes      | D88388 (55 gal.)          | DU and Mineral Oil, 1.0 ppm PCB, Li Tic's |
| 83 gallon overpack | X10918    | 483 | 7/8/98                | 390                                  | 610                               | 688                                  | yes      | D88387 (55 gal.)          | DU and Mineral Oil, 6.2 ppm PCB           |
| 83 gallon overpack | X10919    | 483 | 7/8/98                | 622                                  | 490                               | 568                                  | yes      | D87699 (55 gal.)          | DU and Mineral Oil                        |
| 83 gallon overpack | X10920    | 483 | 7/9/98                | 366                                  | 511                               | 589                                  | yes      | D92857 (55 gal.)          |   |
| 83 gallon overpack | X10921    | 483 | 7/9/98                | 427                                  | 557                               | 635                                  | yes      | D88406 (55 gal.)          |   |
| 83 gallon overpack | X10922    | 483 | 7/9/98                | 335                                  | 448                               | 526                                  | yes      | D92858 (55 gal.)          |   |
| 83 gallon overpack | X10923    | 483 | 7/9/98                | 355                                  | 484                               | 562                                  | yes      | D92864 (55 gal.)          |   |
| 83 gallon overpack | X10924    | 483 | 7/8/98                | 344                                  | 642                               | 720                                  | yes      | D88413 (55 gal.)          |   |
| 83 gallon overpack | X10925    | 483 | 7/13/98               | 344                                  | 603                               | 681                                  | yes      | D92862 (55 gal.)          |   |
| 83 gallon overpack | X10926    | 483 | 7/14/98               | 318                                  | 570                               | 648                                  | yes      | D92855 (55 gal.)          |   |
| 83 gallon overpack | X10927    | 483 | 7/8/98                | 352                                  | 614                               | 692                                  | yes      | D88415 (55 gal.)          |   |
| 83 gallon overpack | X10928    | 483 | 7/14/98               | 648                                  | 648                               | 726                                  | yes      | D92853 (55 gal.)          |   |
| 83 gallon overpack | X10929    | 483 | 7/9/98                | 369                                  | 481                               | 559                                  | yes      | D92860 (55 gal.)          |   |
| 83 gallon overpack | X10930    | 483 | 7/9/98                | 365                                  | 509                               | 587                                  | yes      | D92869 (55 gal.)          |   |
| 83 gallon overpack | X10931    | 483 | 7/8/98                | 431                                  | 568                               | 646                                  | yes      | D88414 (55 gal.)          |   |
| 83 gallon overpack | X10932    | 483 | 7/9/98                | 396                                  | 529                               | 607                                  | yes      | D92859 (55 gal.)          |   |
| 83 gallon overpack | X10933    | 483 | 7/9/98                | 323                                  | 613                               | 691                                  | yes      | D88419 (55 gal.)          |   |
| 83 gallon overpack | X10934    | 483 | 7/8/98                | 496                                  | 609                               | 687                                  | yes      | D88417 (55 gal.)          |   |
| 83 gallon overpack | X10935    | 483 | 7/8/98                | 338                                  | 603                               | 681                                  | yes      | D88425 (55 gal.)          |   |
| 83 gallon overpack | X13255    | 325 | 3/8/99                | N/A                                  | 284                               | 362                                  | yes      | D93473 (55 gal)           | sample returns                            |
| 83 gallon overpack | X13256    | 325 | 03/10/99              | N/A                                  | 294                               | 372                                  | yes      | D93476 (55 gal)           | UH3 sample returns                        |
| 83 gallon overpack | X13257    | 325 | 2/16/99               | N/A                                  | 402                               | 480                                  | yes      | D93468 (55 gal)           | UH3 sample returns                        |
| 83 gallon overpack | X13258    | 325 | 7/6/98                | N/A                                  | 634                               | 712                                  | yes      | D87713 (55 gal)           | original sample return drum               |

## TRENCH 1 WASTE CONTAINERS

| Container Type      | WEM's No. | IDC | Fill (set-up) Date | weight (lbs) prior to Inerting | weight (lbs) after Inerting | Final Shipping Weight (lbs) | estimated volume mineral oil (liters) | estimated quantity of DU (lbs) | Traveler | Overpack Container No. | Notes   |
|---------------------|-----------|-----|--------------------|--------------------------------|-----------------------------|-----------------------------|---------------------------------------|--------------------------------|----------|------------------------|---|
| 110 gallon overpack | X10057    | 483 | 07/06/98           | 347                            | 426                         | 528                         | 38                                    | 209                            | yes      | X09851 (83 gal.)       |   |
| 110 gallon overpack | X10058    | 483 | 06/30/98           | 1092                           | 1558                        | 1660                        | 244                                   | 954                            | yes      | SPECIAL                | will require further overpacking, excavated 55 gal. drum in 110 gal., weight is with pallet |
| 110 gallon overpack | X10059    | 483 | 07/28/98           | 483                            | 638                         | 740                         | 78                                    | 345                            | yes      | X10371 (85 gal.)       |   |
| 110 gallon overpack | X10060    | 483 | 07/01/98           | 260                            | 370                         | 472                         | 54                                    | 122                            | yes      | X09882 (83 gal.)       |   |
| 110 gallon overpack | X10061    | 483 | 07/06/98           | 305                            | 370                         | 472                         | 30                                    | 167                            | yes      | X09863 (83 gal.)       |   |
| 110 gallon overpack | X10062    | 483 | 07/06/98           | 254                            | 372                         | 474                         | 59                                    | 116                            | yes      | X09864 (83 gal.)       |   |
| 110 gallon overpack | X10063    | 823 | 08/14/98           | 708                            | 711                         | 813                         | N/A                                   | N/A                            | yes      | X10399 (85 gal.)       | cemented cyanide  |
| 110 gallon overpack | X10064    | 483 | 07/28/98           | 567                            | 955                         | 1057                        | 203                                   | 429                            | yes      | X10374 (85 gal.)       |   |
| 110 gallon overpack | X10065    | 483 | 07/01/98           | 282                            | 375                         | 477                         | 45                                    | 144                            | yes      | X09854 (83 gal.)       |   |
| 110 gallon overpack | X10066    | 823 | 08/12/98           | 758                            | 758                         | 860                         | N/A                                   | N/A                            | yes      | X10397 (85 gal.)       | cemented cyanide  |
| 110 gallon overpack | X10067    | 483 | 07/01/98           | 333                            | 486                         | 588                         | 77                                    | 195                            | yes      | X09888 (83 gal.)       |   |
| 110 gallon overpack | X10068    | 483 | 07/06/98           | unknown                        | 485                         | 567                         | unknown                               | unknown                        | yes      | X09875 (83 gal.)       |   |
| 110 gallon overpack | X10069    | 483 | 07/07/98           | 375                            | 585                         | 687                         | 108                                   | 237                            | yes      | X09890 (83 gal.)       |   |
| 110 gallon overpack | X10070    | 483 | 06/30/98           | 482                            | 726                         | 828                         | 126                                   | 344                            | yes      | X09883 (83 gal.)       |   |
| 110 gallon overpack | X10071    | 483 | 07/01/98           | 271                            | 573                         | 675                         | 157                                   | 133                            | yes      | X09857 (83 gal.)       |   |
| 110 gallon overpack | X10072    | 483 | 07/07/98           | 448                            | 714                         | 816                         | 138                                   | 310                            | yes      | X09839 (83 gal.)       |   |
| 110 gallon overpack | X10073    | 483 | 06/30/98           | 632                            | 851                         | 953                         | 112                                   | 494                            | yes      | X09878 (83 gal.)       | contained black filters   |
| 110 gallon overpack | X10074    | 483 | 06/29/98           | 688                            | 994                         | 1096                        | 159                                   | 550                            | yes      | X09874 (83 gal.)       | 75% intact  |
| 110 gallon overpack | X10075    | 483 | 07/07/98           | 523                            | 654                         | 756                         | 66                                    | 385                            | yes      | X09842 (83 gal.)       |   |
| 110 gallon overpack | X10076    | 483 | 07/01/98           | 255                            | 386                         | 488                         | 66                                    | 117                            | yes      | X09881 (83 gal.)       |   |
| 110 gallon overpack | X10077    | 483 | 07/01/98           | 381                            | 480                         | 582                         | 49                                    | 243                            | yes      | X09886 (83 gal.)       |   |
| 110 gallon overpack | X10078    | 483 | 07/07/98           | 381                            | 561                         | 663                         | 92                                    | 243                            | yes      | X09856 (83 gal.)       |   |
| 110 gallon overpack | X10079    | 483 | 07/06/98           | 595                            | 609                         | 711                         | 3                                     | 457                            | yes      | X09893 (83 gal.)       | Included screens  |
| 110 gallon overpack | X10080    | 483 | 07/01/98           | 522                            | 800                         | 902                         | 144                                   | 384                            | yes      | X09855 (83 gal.)       |   |
| 110 gallon overpack | X10081    | 483 | 07/01/98           | 338                            | 507                         | 609                         | 86                                    | 200                            | yes      | X09885 (83 gal.)       |   |
| 110 gallon overpack | X11049    | 483 | 08/03/98           | 593                            | 930                         | 1032                        | 175                                   | 455                            | yes      | X10398 (85 gal.)       |   |
| 110 gallon overpack | X11050    | 483 | 08/04/98           | 718                            | 866                         | 968                         | 75                                    | 580                            | yes      | X10375 (85 gal.)       |   |
| 110 gallon overpack | X11051    | 483 | 08/12/98           | 1074                           | 1197                        | 1299                        | 61                                    | 936                            | yes      | X10372 (85 gal.)       |   |
| 110 gallon overpack | X11055    | 483 | 06/24/98           | 840                            | 1096                        | 1198                        | 132                                   | 702                            | yes      | X09841 (83 gal.)       |   |
| 110 gallon overpack | X11056    | 483 | 06/30/98           | 696                            | 1010                        | 1112                        | 163                                   | 558                            | yes      | X09884 (83 gal.)       |   |
| 110 gallon overpack | X11057    | 483 | 06/25/98           | 471                            | 702                         | 804                         | 119                                   | 333                            | yes      | X09866 (83 gal.)       | contains 55 gal. drum w/ ice cream cartons, weight is with drum grabber                     |
| 110 gallon overpack | X11058    | 483 | 06/22/98           | 747                            | 977                         | 1079                        | 118                                   | 609                            | yes      | X09872 (83 gal.)       |   |
| 110 gallon overpack | X11059    | 483 | 06/23/98           | 764                            | 1004                        | 1106                        | 124                                   | 626                            | yes      | X09868 (83 gal.)       |   |
| 110 gallon overpack | X11060    | 483 | 06/25/98           | 407                            | 580                         | 682                         | 88                                    | 269                            | yes      | X09844 (83 gal.)       |   |
| 110 gallon overpack | X11061    | 483 | 06/23/98           | 470                            | 683                         | 785                         | 109                                   | 332                            | yes      | X09865 (83 gal.)       |   |
| 110 gallon overpack | X11062    | 483 | 06/30/98           | 949                            | 1280                        | 1382                        | 172                                   | 811                            | yes      | X09862 (83 gal.)       |   |
| 110 gallon overpack | X11063    | 483 | 07/01/98           | 754                            | 1099                        | 1201                        | 180                                   | 616                            | yes      | X09887 (83 gal.)       |   |
| 110 gallon overpack | X11064    | 483 | 06/17/98           | unknown                        | 910                         | 1012                        | 150                                   | 483                            | yes      | X09837 (83 gal.)       | 150 liters of mineral oil reported, non-intact  |
| 110 gallon overpack | X11065    | 483 | 06/25/98           | 530                            | 655                         | 757                         | 62                                    | 392                            | yes      | X09880 (83 gal.)       |   |
| 110 gallon overpack | X11066    | 483 | 06/22/98           | 618                            | 919                         | 1021                        | 156                                   | 480                            | yes      | X09867 (83 gal.)       |   |
| 110 gallon overpack | X11067    | 374 | 06/24/98           | unknown                        | 395                         | 497                         | unknown                               | unknown                        | yes      | X09852 (83 gal.)       | non-intact, Thorium waste   |
| 110 gallon overpack | X11068    | 483 | 06/25/98           | 458                            | 704                         | 806                         | 127                                   | 320                            | yes      | X09870 (83 gal.)       |   |
| 110 gallon overpack | X11069    | 483 | 06/24/98           | 795                            | 1078                        | 1180                        | 147                                   | 657                            | yes      | X09869 (83 gal.)       | sand added due to temperature increase  |
| 110 gallon overpack | X11070    | 483 | 06/18/98           | 541                            | 808                         | 910                         | 138                                   | 403                            | yes      | X09843 (83 gal.)       |   |

110 GALLON OVERPACK

## TRENCH 1 WASTE CONTAINERS

| Container Type      | WEM's No. | IDC | Fill (set-up) Date | weight (lbs) prior to Inerting | weight (lbs) after Inerting | Final Shipping Weight (lbs) | estimated volume mineral oil (liters) | estimated quantity of DU (lbs) | Traveler | Overpack Container No. | Notes                                     |
|---------------------|-----------|-----|--------------------|--------------------------------|-----------------------------|-----------------------------|---------------------------------------|--------------------------------|----------|------------------------|---|
| 110 gallon overpack | X11071    | 483 | 06/25/98           | 542                            | 761                         | 863                         | 112                                   | 404                            | yes      | X09894 (83 gal.)       |   |
| 110 gallon overpack | X11072    | 483 | 06/25/98           | 609                            | 857                         | 959                         | 128                                   | 471                            | yes      | X09871 (83 gal.)       | drum smashed                              |
| 110 gallon overpack | X11073    | 823 | 08/14/98           | 737                            | 740                         | 842                         | N/A                                   | N/A                            | yes      | X10393 (85 gal.)       | cemented cyanide                          |
| 110 gallon overpack | X11074    | 823 | 08/14/98           | 652                            | 659                         | 761                         | N/A                                   | N/A                            | yes      | X10382 (85 gal.)       | cemented cyanide                          |
| 110 gallon overpack | X11075    | 823 | 08/14/98           | 695                            | 699                         | 801                         | N/A                                   | N/A                            | yes      | X10388 (85 gal.)       | cemented cyanide                          |
| 110 gallon overpack | X11076    | 483 | 06/18/98           | 612                            | 845                         | 947                         | 120                                   | 474                            | yes      | X09850 (83 gal.)       |   |
| 110 gallon overpack | X11077    | 483 | 06/24/98           | 542                            | 785                         | 887                         | 125                                   | 404                            | yes      | X09877 (83 gal.)       |   |
| 110 gallon overpack | X11078    | 483 | 06/17/98           | unknown                        | 870                         | 972                         | 350                                   | unknown                        | yes      | X09838 (83 gal.)       | 350 liters mineral oil reported           |
| 110 gallon overpack | X11079    | 483 | 06/16/98           | 516                            | 575                         | 677                         | 27                                    | 378                            | yes      | X09835 (83 gal.)       | drum partially crushed, inerted with sand |
| 110 gallon overpack | X11080    | 483 | 07/01/98           | 899                            | 1207                        | 1309                        | 160                                   | 761                            | yes      | X09876 (83 gal.)       |   |
| 110 gallon overpack | X11081    | 823 | 08/14/98           | 631                            | 633                         | 735                         | N/A                                   | N/A                            | yes      | X10390 (85 gal.)       | cemented cyanide                          |
| 110 gallon overpack | X11083    | 823 | 08/14/98           | 751                            | 767                         | 869                         | N/A                                   | N/A                            | yes      | X10376 (85 gal.)       | cemented cyanide                          |
| 110 gallon overpack | X11084    | 823 | 08/14/98           | 747                            | 754                         | 856                         | N/A                                   | N/A                            | yes      | X10377 (85 gal.)       | cemented cyanide                          |
| 110 gallon overpack | X11085    | 823 | 08/12/98           | 697                            | 707                         | 809                         | N/A                                   | N/A                            | yes      | X10401 (85 gal.)       | cemented cyanide                          |
| 110 gallon overpack | X11087    | 483 | 06/17/98           | unknown                        | 943                         | 1045                        | 155                                   | 506                            | yes      | X09840 (83 gal.)       | 155 liters mineral oil reported           |
| 110 gallon overpack | X11092    | 823 | 8/14/98            | 698                            | 716                         | 818                         | N/A                                   | N/A                            | yes      | X10373 (85 gal.)       | cemented cyanide                          |

110 GALLON OVERPACK

6/2/99

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TENCH 1 WASTE CONTAINERS

| Container Type | WEM's No. | IDC | Fill (set-up)<br>Date | Final<br>Shipping<br>Weight<br>(lbs) | In<br>Storage<br>Area | Traveler | Overpack<br>Container No. | Notes                 |
|----------------|-----------|-----|-----------------------|--------------------------------------|-----------------------|----------|---------------------------|-----------------------|
| B-88 Metal Box | X09695    | 864 | 08/24/98              |                                      | yes                   | yes      | N/A                       | shipped to NTS 2/3/99 |
| B-88 Metal Box | X09696    | 864 | 08/24/98              |                                      | yes                   | yes      | N/A                       | shipped to NTS 2/3/99 |
| B-88 Metal Box | X09697    | 864 | 08/24/98              |                                      | yes                   | yes      | N/A                       | shipped to NTS 2/3/99 |
| B-88 Metal Box | X09698    | 374 | 08/26/98              | 9028                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09699    | 374 | 08/26/98              | 9410                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09700    | 374 | 08/26/98              | 9658                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09701    | 325 | 08/26/98              | 6466                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09702    | 374 | 08/26/98              | 9690                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09703    | 374 | 08/26/98              | 9308                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09704    | 374 | 08/26/98              | 9486                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09705    | 374 | 08/26/98              | 9352                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09706    | 374 | 08/26/98              | 9812                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09707    | 374 | 08/26/98              | 9110                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09708    | 374 | 08/26/98              | 9482                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09709    | 374 | 08/26/98              | 8784                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09710    | 374 | 08/26/98              | 9666                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09711    | 374 | 08/26/98              | 9396                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09712    | 374 | 08/20/98              | 8512                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09713    | 374 | 08/19/98              | 9592                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09714    | 374 | 08/19/98              | 8972                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09715    | 374 | 08/20/98              | 9026                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09716    | 374 | 08/20/98              | 9472                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09717    | 374 | 08/20/98              | 8796                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09718    | 374 | 08/26/98              | 8894                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09719    | 374 | 08/26/98              | 9058                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09720    | 374 | 08/26/98              | 9618                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09721    | 374 | 08/26/98              | 8962                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09722    | 374 | 08/26/98              | 9218                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09723    | 374 | 08/26/98              | 9226                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09724    | 374 | 08/26/98              | 9108                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09725    | 374 | 08/26/98              | 9178                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09726    | 325 | 07/15/98              | 3602                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09727    | 374 | 08/17/98              | 9104                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09728    | 374 | 07/14/98              | 9678                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09729    | 374 | 08/11/98              | 9636                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09730    | 374 | 08/19/98              | 9226                                 | yes                   | yes      | N/A                       |                       |

B-88 METAL BOX



TENCH 1 WASTE CONTAINERS

| Container Type | WEM's No. | IDC | Fill (set-up)<br>Date | Final<br>Shipping<br>Weight<br>(lbs) | In<br>Storage<br>Area | Traveler | Overpack<br>Container No. | Notes                 |
|----------------|-----------|-----|-----------------------|--------------------------------------|-----------------------|----------|---------------------------|-----------------------|
| B-88 Metal Box | X09731    | 374 | 07/29/98              | 8902                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09732    | 374 | 07/29/98              | 9446                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09733    | 325 | 07/14/98              | 1706                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09734    | 374 | 08/19/98              | 9536                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09735    | 374 | 08/19/98              | 9672                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09736    | 325 | 07/06/98              | 2226                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09737    | 374 | 07/06/98              | 9372                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09738    | 374 | 07/07/98              | 9494                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09739    | 374 | 07/07/98              | 9562                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09740    | 326 | 09/08/98              | 1420                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09741    | 374 | 06/29/98              | 9660                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09742    | 374 | 06/23/98              | 9632                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09743    | 374 | 06/30/98              | 9140                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09744    | 374 | 06/30/98              | 9150                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09745    | 374 | 06/29/98              | 9144                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09746    | 374 | 06/29/98              | 8620                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09747    | 374 | 06/29/98              | 9672                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09748    | 374 | 06/29/98              | 9302                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09749    | 374 | 07/01/98              | 9222                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09750    | 374 | 06/29/98              | 9794                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09751    | 374 | 06/24/98              | 9976                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09752    | 374 | 06/22/98              | 9148                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09753    | 374 | 06/25/98              | 9702                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09754    | 374 | 06/25/98              | 9662                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09755    | 374 | 06/29/98              | 8818                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09756    | 374 | 06/29/98              | 9228                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09757    | 374 | 06/22/98              | 9018                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09758    | 374 | 06/24/98              | 8674                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09759    | 374 | 06/23/98              | 9960                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09760    | 325 | 07/06/98              | 2214                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09761    | 374 | 06/18/98              | 9850                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09762    | 374 | 06/16/98              | 8430                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09763    | 374 | 06/12/98              | 8340                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X09764    | 374 | 06/16/98              | 9586                                 | yes                   | yes      | N/A                       |                       |
| B-88 Metal Box | X14519    | 861 | 09/24/98              |                                      | yes                   | yes      | N/A                       | shipped to NTS 2/3/99 |
| B-88 Metal Box | X14520    | 861 | 09/24/98              |                                      | yes                   | yes      | N/A                       | shipped to NTS 2/3/99 |

B-88 METAL BOX

## TRENCH 1 WASTE CONTAINERS

| Container Type | WEM's No. | IDC | Fill (set-up)<br>Date | Final<br>Shipping<br>Weight<br>(lbs) | In<br>Storage<br>Area | Traveler | Overpack<br>Container No. | Notes   |
|----------------|-----------|-----|-----------------------|--------------------------------------|-----------------------|----------|---------------------------|---|
| B-12 Metal Box | X09794    | 861 | 09/25/98              | 862                                  | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09795    | 326 | 09/30/98              | 1694                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09796    | 326 | 09/25/98              | 890                                  | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09797    | 326 | 12/18/98              | 1292                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09798    | 374 | 08/18/98              | 3758                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09799    | 374 | 08/19/98              | 3874                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09800    | 374 | 08/18/98              | 4024                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09801    | 374 | 08/18/98              | 3906                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09803    | 374 | 08/19/98              | 4392                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09804    | 374 | 08/19/98              | 3994                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09805    | 374 | 08/14/98              | 3572                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09806    | 374 | 07/29/98              | 5092                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09807    | 374 | 07/07/98              | 4154                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09808    | 374 | 06/30/98              | 4374                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09809    | 374 | 08/17/98              | 4088                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09810    | 374 | 08/14/98              | 4342                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09821    | 374 | 08/17/98              | 3866                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09822    | 374 | 08/17/98              | 4088                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09823    | 374 | 06/25/98              | 4222                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09824    | 374 | 06/22/98              | 5090                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09825    | 374 | 06/19/98              | 5514                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09826    | 374 | 07/06/98              | 3936                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09827    | 374 | 06/23/98              | 4404                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09828    | 374 | 06/24/98              | 4624                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09829    | 374 | 08/05/98              | 4850                                 | yes                   | yes      | N/A                       | contains soil & a 5 gal. metal container w/ potential sample jars |
| B-12 Metal Box | X09830    | 374 | 06/15/98              | 4769                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09831    | 374 | 6/16/98               | 5238                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09832    | 326 | 09/15/98              | 1120                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09833    | 374 | 08/04/98              | 4260                                 | yes                   | yes      | N/A                       |   |
| B-12 Metal Box | X09834    | 374 | 08/04/98              | 4762                                 | yes                   | yes      | N/A                       |   |

Appendix D-2  
T-1 Depleted Uranium Gamma Spectroscopy Data,  
Descriptions of Samples and Radioactive Material Type Determination Spreadsheet

Best Available Copy

T-1 Gamma Spectroscopy Data and Summary Information

| Sample #    | Inner Drum # | QC Type | Collection Date | Event Comment  | All gamma spectroscopy results in pCi/g |                  |               |                  |               |                  |              |                 |                |                   | Calculated U mass ratio % (U-235/U-238) | Calculated Uranium Type DU/EU/Natural |
|-------------|--------------|---------|-----------------|--|---|------------------|---------------|------------------|---------------|------------------|--------------|-----------------|----------------|-------------------|---|---------------------------------------|
|             |              |         |                 |  | AC-228 Result                           | AC-228 Detection | AM-241 Result | AM-241 Detection | TH-234 Result | TH-234 Detection | U-235 Result | U-235 Detection | PA-234M Result | PA-234M Detection |   |                                       |
| 98A2105-001 | X09832       | REAL    | 6/12/98         | SOURCE REMOVAL DEPLETED URANIUM IN WEMIS # X09832 FIVE LOCATIONS WITHIN B12 FIELD SCREENED, HIGH BETA IN ONE LOCATION, HIGH BETA LOCATION SAMPLED, MIXED SOIL AND DUL, MAINLY SOIL   | 0                                       | 2.4246           | 0             | 21.316           | 9310.2        | 50.841           | 102.63       | 2.3179          | 9770.1         | 85.906            | 0.16                                    | depleted                              |
| 98A2105-003 | X09830       | REAL    | 6/15/98         | SOURCE REMOVAL DEPLETED URANIUM IN WEMIS# X9830, FIELD SCREEN 5 LOCATIONS, SAMPLED 2 HOT SPOTS, BIASED FOR BLACK MATERIAL  | 0.95959                                 | 0.7915           | 0             | 10.619           | 1908.8        | 22.172           | 23.92        | 1.5201          | 1695.2         | 37.583            | 0.22                                    | depleted                              |
| 98A2105-005 | X09835       | REAL    | 6/15/98         | 30 GAL DU DRUM IN 83-GAL OVERPACK, DRUM HAD 10-15 GAL OF FINE BLACK POWDER, INERTED DRUM W/ SAND AT TRENCH. REMOVED SAND FOR SAMPLE-MOSTLY PURE BLACK POWDER FROM WITHIN DRUM. POWDER EXHIBITED WHITE SMOKE-MAY BE PYROPHORIC.   | 0                                       | 9.47             | 0             | 468.46           | 220000        | 1321.8           | 2627.5       | 81.332          | 204690         | 188.86            | 0.20                                    | depleted                              |
| 98A2105-006 | X09850       | REAL    | 6/17/98         | BLACK PASTE LIKE DU IN RUSTED 30 GAL OVERPACKED INTO A NEW 83 GAL. ADDED ABOUT 36 L MINERAL OIL TO INERT. 160 PPM VOC ON PID. 1000 PPM ON PID, DRUM PUNCTURED TWICE.   | 0                                       | 14.885           | 0             | 811.2            | 163600        | 1473.7           | 1675.4       | 86.204          | 183450         | 289.86            | 0.14                                    | depleted                              |
| 98A2105-007 | X09837       | REAL    | 6/17/98         | DU IN RUSTED 33 GAL IN RUSTED 55 GAL OVERPACKED INTO A NEW 83 GAL. SOME LIQUID (ASSUMED WATER) SPILLED IN TRENCH. BRACED AND INERTED W/ MINERAL OIL IN 83 GAL OVERPACK. DU HIGHLY OXIDIZED YELLOW-YELLOW GREEN. SHADES OF RED, MOIST, STICKY. FROM UPPER 6 IN  | 0                                       | 13.956           | 0             | 682.06           | 154640        | 1242.5           | 1313.5       | 60.988          | 130790         | 275.63            | 0.16                                    | depleted                              |
| 98A2105-009 | X09840       | REAL    | 6/17/98         | DU DRY BLACK POWDER IN RUSTED 30 GAL OVERPACKED INTO A NEW 83 GAL. ADDED 155 L OF MINERAL OIL. ADDED DTA, TGA, VOA, XRD, XRF, IR, ISO-P, U, AM & GAMMA SPEC FOR CHARACTERIZATION   | 0                                       | 18.994           | 0             | 1083.6           | 233700        | 3049.8           | 2588         | 175.8           | 216370         | 376.26            | 0.19                                    | depleted                              |
| 98A2105-010 | X09838       | REAL    | 6/17/98         | DU WET BLACK POWDER WITH VISIBLE TURNINGS AND 3-IN GREEN OBJECT IN RUSTED 30 GAL OVERPACKED INTO A NEW 83 GAL. ADDED ABOUT 150 L OF MINERAL OIL. ADDED DTA, TGA, VOA, XRD, XRF, IR, ISO-P, U, AM FOR CHARACTERIZATION  | 0                                       | 15.153           | 308.47        | 274.41           | 93244         | 1256.3           | 1117.5       | 60.42           | 139540         | 288.12            | 0.12                                    | depleted                              |
| 98A2105-011 | X09831       | REAL    | 6/18/98         | DU END OF B-12, SMALL YELLOW/GREEN DU AND FILINGS, 600 PPM TVA, 1000 PPM PID   | 0                                       | 15.545           | 0             | 759.67           | 223945        | 2090.9           | 2127.2       | 101.96          | 180975         | 296.88            | 0.18                                    | depleted                              |
| 98A2105-013 | X09843       | REAL    | 6/18/98         | DU DRUM 3/4 FULL OF MOIST BLACK POWDER INSPECTED TOP 6 IN. COATING OF YELLOW/GREEN OXIDE 1/4 INDEEP LATE TURNINGS IN BLACK POWDER, SOME SHINY CUTTINGS. OTHER FRAGMENT'S SPLINTER GUN BARREL BLUE TO BLACK TO RUSTY. INERTED W/ MINERAL OIL VOC 1800 PPM PID   | 0                                       | 16.509           | 0             | 861.94           | 170080        | 1620.3           | 1356.8       | 117.5           | 177990         | 326.22            | 0.12                                    | depleted                              |
| 98A2105-014 | X09825       | REAL    | 6/19/98         | DU BLACK, YELLOW GREEN AND ORANGE OXIDES FROM NON INTACT DRUMS SLUDGE LIKE MATERIAL MIXED WITH DIRT. PACKED INTO NEW 8-12 SAMPLES FROM 2 DRUMS IN B-12. ONE MOIST CLAY LIKE, OTHER GREEN AND YELLOW DRIER. TVA 1000 PPM. PID 1,500 PPM. PID 3,000 PPM. BLACK OXIDE. SLIGHTLY WET AND COHESIVE. TVA 1000, PID 1100. | 0                                       | 15.017           | 0             | 746.94           | 146100        | 1384.4           | 1399.5       | 79.845          | 167260         | 306.07            | 0.13                                    | depleted                              |
| 98A2105-015 | X09872       | REAL    | 6/22/98         |  | 0                                       | 4.0161           | 357.94        | 50.009           | 28545         | 115.52           | 332.2        | 6.9232          | 28557          | 73.981            | 0.18                                    | depleted                              |

T-1 Gamma Spectroscopy Data and Summary Information

| Sample #    | Inner Drum # | QC Type | Collection Date | Event Comment   | All gamma spectroscopy results in pCi/g |                  |               |                  |               |        | U-235 Result | U-235 Detection | U-235 Result | PA-234M Detection | PA-234M Result | Detection | Calculated U mass ratio % (U-235/U-238) | Calculated Uranium Type |
|-------------|--------------|---------|-----------------|---|---|------------------|---------------|------------------|---------------|--------|--------------|-----------------|--------------|-------------------|----------------|-----------|---|-------------------------|
|             |              |         |                 |   | AC-228 Result                           | AM-241 Detection | AM-241 Result | TH-234 Detection | TH-234 Result |        |              |                 |              |                   |                |           |   |                         |
| 98A2105-016 | X09824       | REAL    | 6/22/98         | SAMPLED FROM 2 DRUMS; 1 WITH BLACK OXIDIZED POWDER, THE OTHER WITH GREENISH BLACK SOLIDS. SAMPLE WAS COLLECTED AS B-12 WAS FILLED BY USING A ZIPLOC BAG, THEN FILLING SAMPLE JARS FROM THE BAG. TVA-1000, PID-120.                                      |   |                  | 0             | 15.68            | 0             | 963.27 | 185130       | 1554.4          | 1575.2       | 132.09            | 186030         | 307.68    |   | 0.13 depleted           |
| 98A2105-017 | X09867       | REAL    | 6/22/98         | DRUM APPROX. 90% FULL, BLACK POWDER, SLIGHTLY DAMP, SLIGHTLY COHESIVE. FID-7000, TVA-1000.  |   |                  | 0             | 17.496           | 0             | 1053.5 | 207290       | 1763.3          | 1403.3       | 114.14            | 209090         | 355.48    |   | 0.10 depleted           |
| 98A2105-019 | X09868       | REAL    | 6/23/98         | DU BLACK GRANULAR MATERIALS WITH TURNINGS, DRUM ABOUT 2/3 FULL SLIGHTLY DAMP  |   |                  | 0             | 25.462           | 0             | 1796.5 | 322070       | 2975.2          | 2331         | 185.59            | 325050         | 484.21    |   | 0.11 depleted           |
| 98A2105-020 | X09865       | REAL    | 6/23/98         | DU SATURATED BLACK MATERIAL, WET LIKE MUD, DRUM ABOUT 1/2 FULL.   |   |                  | 0             | 15.535           | 0             | 846.27 | 172320       | 1404.7          | 1474.8       | 85.588            | 172300         | 305.7     |   | 0.13 depleted           |
| 98A2105-021 | X09827       | REAL    | 6/23/98         | DU METAL TURNINGS AND CUTTINGS, SPRING, GREENISH YELLOWISH, LONG AND THIN, CURLY, SAMPLED COMPOSITE OF THREE TYPES OF MATERIAL, FINE CUTTINGS/COARSE CUTTINGS/ AND GREEN/YELLOW W/ SOLIDS. BOTTLES HAVE MANY VOID SPACES. SHEARS COUND NOT CUT MATERIAL |   |                  | 0             | 23.247           | 0             | 1141.4 | 222210       | 1947.4          | 1768.3       | 116.57            | 221700         | 504.69    |   | 0.12 depleted           |
| 98A2105-022 | X09877       | REAL    | 6/24/98         | DU DAMP COHESIVE GREENISH BLACK CONTENTS  |   |                  | 0             | 14.782           | 0             | 772.21 | 163550       | 1258.5          | 1139.9       | 74.195            | 162580         | 291.75    |   | 0.11 depleted           |
| 98A2105-023 | X09852       | REAL    | 6/24/98         | DU SOIL TANNISH/BROWN/RUSTY, FILAMENT LIKE CONTENT W/ GREENISH COHESIVE CHUNKS. VERY LITTLE MATERIAL IN DRUM, SO DIFFICULT TO COLLECT REPRESENTATIVE  | 19709                                   | 53.088           | 0             | 294.345          | 0             | 2549.5 | 0            | 2549.5          | 0            | 56.407            | 0              | 1360.6    | N.A.                                    | Thorium Waste           |
| 98A2105-024 | X09852       | DUP     | 6/24/98         | SEE 98A2105-023   | 18348                                   | 49.711           | 0             | 275.54           | 0             | 2310.1 | 0            | 2310.1          | 0            | 53.45             | 0              | 1298.7    | N.A.                                    | Thorium Waste           |
| 98A2105-026 | X09828       | REAL    | 6/24/98         | DU METAL TURNINGS, GREENISH YELLOISH GRANULAR MATERIAL. SAMPLED FROM 4 AREAS FROM B-12. THREE AREAS YELLOW/GREEN MATERIAL OTHER AREAS INTACT TURNINGS.  |   |                  |               |                  |               |        |              |                 |              |                   |                |           |   |                         |
| 98A2105-027 | X09841       | REAL    | 6/24/98         | DU INTACT DRUM ABOUT 85% FULL OF CONSOLIDATED GREENISH MATERIAL. VERY HARD. SAMPLED BY SCRAPING SURFACE.  | 0                                       | 18.737           | 0             | 960.97           | 0             | 960.97 | 198780       | 1688.1          | 1215.3       | 121.05            | 197020         | 384.94    |   | 0.10 depleted           |
| 98A2105-028 | X09869       | REAL    | 6/24/98         | DU DRUM INTO B3 OVERPACK, SHOWED HEAT RISE INERTED WITH 2 GALLONS SAND AND MINERAL OIL BEFORE SAMPLING. DRY STICKY BLACK POWDER, LIKE PHOTOCOPIER TONER   | 0                                       | 20.027           | 0             | 1224.7           | 0             | 1224.7 | 238660       | 2167.9          | 1780.9       | 105.17            | 237490         | 373.57    |   | 0.12 depleted           |
| 98A2105-029 | X09870       | REAL    | 6/25/98         | BLACK POWDER SLIGHTLY DAMP DRUM ABOUT HALF FULL PLACE IN B3-GAL OVERPACK  | 0                                       | 17.313           | 0             | 1161.8           | 0             | 1161.8 | 219530       | 1990            | 1741.2       | 110.64            | 216010         | 339.53    |   | 0.13 depleted           |
| 98A2105-030 | X09894       | REAL    | 6/25/98         | DU FROM DRUM SLIGHTLY DAMP BLACK POWDER, OVERPACKED INTO B3 GAL   | 0                                       | 15.201           | 0             | 783.26           | 0             | 783.26 | 165350       | 1325.8          | 1098         | 75.566            | 161730         | 297.51    |   | 0.11 depleted           |
| 98A2105-034 | X09871       | REAL    | 6/25/98         | DU DRUM DAMAGED ABOUT 1/3 FULL. DU BLACKENED METAL CHIPS, COUSE GRANULAR, DRY WITH SMALL AMOUNT OF GREENISH MATERIAL  | 0                                       | 18.457           | 0             | 1045             | 0             | 1045   | 210260       | 1846            | 1580.2       | 113.14            | 211290         | 363.59    |   | 0.12 depleted           |
| 98A2105-035 | X09866       | REA     | 6/25/98         | DU BLACKISH, DAMP, COHESIVE, DISTINCT CHIPS AND TURNINGS, INTO B3-GAL OVERPACK  | 0                                       | 25.149           | 0             | 1906             | 0             | 1906   | 318040       | 5693.7          | 2748.7       | 225.32            | 330940         | 479.21    |   | 0.13 depleted           |
| 98A2105-035 | X09866       | REA     | 6/25/98         | TURNINGS, INTO B3-GAL OVERPACK  | 0                                       | 11.423           | 0             | 412.55           | 0             | 412.55 | 63715        | 747.46          | 715.2        | 36.496            | 63698          | 351.03    |   | 0.17 depleted           |

T-1 Gamma Spectroscopy Data and Summary Information

| 1-1 Gamma Spectroscopy Data and Summary Information |              |         |                 |   |   |                  |               |                  |               |                 |              |                   |              |                |                              |          |              |
|---|--------------|---------|-----------------|---|---|------------------|---------------|------------------|---------------|-----------------|--------------|-------------------|--------------|----------------|------------------------------|----------|--------------|
| Sample #  | Inner Drum # | QC Type | Collection Date | Event Comment   | All gamma spectroscopy results in pCi/g |                  |               |                  |               |                 | Calculated   |                   | Uranium Type |                |                              |          |              |
|   |              |         |                 |   | AC-228 Result                           | AM-241 Detection | AM-241 Result | TH-234 Detection | TH-234 Result | U-235 Detection | U-235 Result | PA-234M Detection |              | PA-234M Result | U mass ratio % (U-235/U-238) |          |              |
| 98A2105-036   | X09845       | REAL    | 6/25/98         | DU DRUM 90% FULL OF GREEN/YELLOW MATERIAL. WITH CARDBOARD 5 GAL ICE CREAM CONTAINERS. SAMPLED FROM 5 CONTAINERS ON TOP LAYER CUTTING OF DARK GREEN OR BLACK COLOR WITH LIGHT GREEN POWDERY MATERIAL. CARDBOARD DRY. | 0                                       | 16.813           | 0             | 1141.9           | 184420        | 1936.2          | 1223.7       | 226480            | 337.62       |                | 0.08                         | depleted |              |
| 98A2105-037   | X09844       | REAL    | 6/25/98         | DU BLACK PASTY MATERIAL BUT NO FREE LIQUID PRESENT. LIMITED GREENISH MATERIAL, DRUM 1/3 FULL INTO NEW 83 GAL OVERPACK   | 0                                       | 14.371           | 0             | 808.51           | 169750        | 1435.2          | 1951.5       | 169010            | 278.27       |                | 0.18                         | depleted |              |
| 98A2105-038   | X09880       | REAL    | 6/25/98         | DU GREENISH FINE MATERIAL AND CHIPS AND TURNINGS. DRY. 30 GAL INTO NEW 83 GAL OVERPACK  | 0                                       | 18.139           | 0             | 953.455          | 196015        | 2822.6          | 1296.6       | 198725            | 362.135      |                | 0.10                         | depleted |              |
| 98A2105-040   | X09823       | REAL    | 6/25/98         | SAMPLED FROM B-12. TWO TYPES OF MATERIAL: GREEN ROCKY AND BROWN PASTY MATERIAL WITH VISIBLE TURNINGS. BROWN FROM END OF BOX, HARD GREEN MATRIAL WAS THROUGHOUT BOX.   | 4107.1                                  | 21.535           | 0             | 809.86           | 62864         | 1454.4          | 353.24       | 95.416            | 59893        | 378.64         |                              | 0.09     | DU + Thorium |
| 98A2105-041   | X09874       | REAL    | 6/29/98         | 30 GAL DU DRUM OVERPACKED INTO NEW 83-GAL OVERPACK. 30 GAL DRUM ABOUT 1/2 FULL. DRY GRANULAR YELLOWISH/GREENISH MATERIAL COHESIVE   | 0                                       | 18.786           | 0             | 1162.2           | 223110        | 1971.1          | 1708.3       | 222390            | 371.23       |                | 0.12                         | depleted |              |
| 98A2105-042   | X09860       | REAL    | 6/30/98         | DU IN 30/55 overpacked into new 83 gal. 30 gal about 60% full, dry cohesive material  | 0                                       | 19.586           | 0             | 1194.3           | 235450        | 2025.1          | 1824.5       | 235150            | 375.6        |                | 0.12                         | depleted |              |
| 98A2105-043   | X09862       | REAL    | 6/30/98         | DU IN 55 GAL ABOUT 2/3 FULL OF 1 GAL CARDBOARD ICE CREAM CONTAINERS FILLED WITH DRY BALCK DU CHIPS AND TURNINGS. DRUM IS YELLOW AND IN GOOD CONDITION   | 0                                       | 23.902           | 0             | 1912.6           | 289250        | 3165.1          | 2660.6       | 319.86            | 334360       | 464.17         |                              | 0.12     | depleted     |
| 98A2105-044   | X09862       | DUP     | 6/30/98         | DU IN 55 GAL ABOUT 2/3 FULL OF 1 GAL CARDBOARD ICE CREAM CONTAINERS FILLED WITH DRY BALCK DU CHIPS AND TURNINGS. DRUM IS YELLOW AND IN GOOD CONDITION   | 0                                       | 23.721           | 0             | 1896.2           | 293010        | 3218.1          | 1238.4       | 170.98            | 324570       | 466.38         |                              | 0.06     | depleted     |
| 98A2105-045   | X09884       | REAL    | 6/30/98         | DU IN 30 GAL/55 GAL 2/3 FULL OF BLACK CHIPS AND TURNINGS. OVERPACKED IN NEW 83 GAL.   | 0                                       | 23.648           | 0             | 1897.6           | 286080        | 3178.6          | 2078.4       | 188.18            | 328380       | 462.02         |                              | 0.10     | depleted     |
| 98A2105-047   | X09878       | REAL    | 6/30/98         | DU 55 GAL DRUM 2/3 FULL OF 1 GAL CARDBOARD ICE CREAM CONTAINERS FILLED WITH GREEN FINE GAINED DU WITH SHINY MATERIAL AND FINE MESH SCREEN, DRUM OVERPACKED INTO NEW 83 GAL  | 0                                       | 23.115           | 0             | 1023.5           | 229540        | 1937.7          | 2628.7       | 108.03            | 271800       | 437.74         |                              | 0.15     | depleted     |
| 98A2105-048   | X09883       | REAL    | 6/30/98         | DU 30 GAL/55 GAL DRUM 2/3 FULL OF BLACK CHIPS & TURNINGS WITH BROWNISH WITH SPARSE SHINY METAL SPECKS AND CHIPS. DRUM OVERPACKED INTO NEW 83 GAL  | 0                                       | 7.6405           | 0             | 175.58           | 30216         | 308             | 530.23       | 16.586            | 30757        | 149.88         |                              | 0.27     | depleted     |
| 98A2105-049   | X10058       | REAL    | 6/30/98         | 55 GAL DRUM WITH 1 GAL CARDBOARD ICE CREAM CONTAINERS AND BROWNISH/GRAY DU WITH SOME GREENISH CHIPS. OVERPACKED INTO 110  | 0                                       | 25.172           | 0             | 1892.2           | 319690        | 7437.7          | 2470.6       | 204.92            | 335010       | 498.46         |                              | 0.11     | depleted     |
| 98A2105-050   | X09808       | REAL    | 6/30/98         | B-12 WITH YELLOW/GREEN MATERIAL. SAMPLED FROM TWO 5 IN DEEP MASSES IN ONE CORNER. VERY HARD MATERIAL USED NONSPARKING BAR TO LOOSEN MATERIAL TO SAMPLE  | 0                                       | 15.526           | 0             | 960.88           | 193910        | 1722.9          | 1455.1       | 113.03            | 184880       | 301.17         |                              | 0.12     | depleted     |

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T-1 Gamma Spectroscopy Data and Summary Information

| Sample #    | Inner Drum # | QC Type | Collection Date | Event Comment   | All gamma spectroscopy results in pCi/g |                  |               |           | TH-234 Result | U-235 Result | PA-234M Result | Detection | Calculated U mass ratio % (U-235/U-238) | Calculated Uranium Type DU/EU/Natural |      |          |
|-------------|--------------|---------|-----------------|---|---|------------------|---------------|-----------|---------------|--------------|----------------|-----------|---|---------------------------------------|------|----------|
|             |              |         |                 |   | AC-228 Result                           | AM-241 Detection | AM-241 Result | Detection |               |              |                |           |   |                                       |      |          |
| 98A2105-051 | X09853       | REAL    | 6/30/98         | 55 GAL FULL OF 1 GAL CARDBOARD ICE CREAM CONTAINERS, SAMPLED FROM 4 CONTAINERS ON TOP LAYER, DU BLACK CHIPS WITH TURNINGS, OVERPACKED IN 83 GAL   | 0                                       | 24.212           | 0             | 1902.5    | 289860        | 3195.6       | 2121.5         | 181.48    | 332380                                  | 474.92                                | 0.10 | depleted |
| 98A2105-053 | X09855       | REAL    | 7/1/98          | DU 30 GAL/55 GAL HAS BLACK TURNINGS AND CHIPS, 30 GAL 1/2 FULL OF TURNINGS, NO SOIL, 55 GAL WELL INTACT, NO CIMCOOL, WITH A FEW SHINY TURNINGS  | 0                                       | 24.415           | 0             | 1919.4    | 310620        | 3226.8       | 2545.6         | 190.78    | 321940                                  | 478.91                                | 0.12 | depleted |
| 98A2105-054 | X09879       | REAL    | 6/30/98         | 55 GAL FULL OF 1 GAL CARDBOARD ICE CREAM CONTAINERS, SAMPLED FROM 8 CONTAINERS ON TOP, BLACKISH GREENISH/YELLOWISH DRY CHIPS, DRUM OVERPACKED INTO 83 GAL   | 0                                       | 23.93            | 0             | 1913.7    | 316540        | 3178.3       | 2581.7         | 248.11    | 320430                                  | 464.43                                | 0.13 | depleted |
| 98A2105-055 | X09887       | REAL    | 7/1/98          | 55 GAL DRUM 2/3 FULL OF CARDBOARD ICE CREAM CONTAINERS, SAMPLED FROM TOP 7 CONTAINERS, DU MOSTLY BLACK TURNINGS AND CHIPS WITH SOME OULL GREEN TURNINGS, OVERPACKED INTO 83 GAL   | 0                                       | 23.694           | 0             | 1892.9    | 302960        | 3174.3       | 2151           | 261.53    | 314090                                  | 462.76                                | 0.11 | depleted |
| 98A2105-056 | X09882       | REAL    | 7/1/98          | 55 GAL IN GOOD SHAPE, 1/3 FULL OF ICE CREAM CONTAINERS FALLEN APART (REMOVED FROM DRUM), DU IS GREEN HARD MASSES, ONE BUNCH OF SHINY BLACK TURNINGS, SOME LIQUID IN BOTTOM OF DRUM, NOT PUMPABLE, BLACK/SHINY TURNINGS, SAMPLED FROM 1 CONTAINER, 83 OVERPACK | 0                                       | 16.839           | 0             | 712.71    | 156380        | 1208.3       | 1125.1         | 72.39     | 156390                                  | 342.87                                | 0.11 | depleted |
| 98A2105-057 | X09881       | REAL    | 7/1/98          | 55 GAL WITH ICE CREAM CONTAINERS ABOUT 3/4 FULL, CONTAINERS HAVE SAND PAPER, 5 HAVE BLACK CHIPS AND TURNINGS WHICH WERE SAMPLED, OVERPACKED INTO 83 GAL   | 0                                       | 17.928           | 0             | 891.99    | 143640        | 1612.6       | 1263.3         | 107.39    | 145830                                  | 351.27                                | 0.13 | depleted |
| 98A2105-059 | X09854       | REAL    | 7/1/98          | 55 GAL WITH ICE CREAM CONTAINERS, DRUM ABOUT 2/3 FULL OF CONTAINERS, REMOVED CONTAINERS DRUM ABOUT 1/3 FULL   | 0                                       | 13.585           | 0             | 371.61    | 86290         | 637.66       | 643.87         | 34.661    | 86189                                   | 287.16                                | 0.12 | depleted |
| 98A2105-060 | X09876       | REAL    | 7/1/98          | 55 GAL WITH ICE CREAM CONTAINERS, DRUM ABOUT 3/4 FULL OF CONTAINERS, CONTAINERS HAVE GREEN AND BLACK DU, SAMPLED 8 CONTAINERS, SOME SHINY MATERIAL PRESENT MOST LIKELY STAINLESS  | 0                                       | 24.316           | 0             | 1907.2    | 305450        | 3192.5       | 2213.7         | 243.78    | 326880                                  | 475                                   | 0.11 | depleted |
| 98A2105-061 | X09857       | REAL    | 7/1/98          | 55 GAL WITH LID INTACT UNABLE TO REMOVE WHOLE LID, DRUM 2/3 FULL OF ICE CREAM CONTAINERS WITH STAINLESS STEEL TURNINGS ON TOP & GREEN DU ON THE BOTTOM, 83 GAL OVERPACKED   | 9.0461                                  | 13.754           | 0             | 699.46    | 157650        | 1210.2       | 1608.7         | 75.322    | 156870                                  | 361.24                                | 0.16 | depleted |
| 98A2105-062 | X09886       | REAL    | 7/1/98          | 55 GAL DRUM WITH ICE CREAM CONTAINERS ABOUT 5/6 FULL, REMOVED CONTAINERS AND DRUM 1/2 FULL, SAMPLED FROM LOWER CONTAINERS ORANGE-BLACK "PEANUT BUTTER" LIKE MATERIAL  | 0                                       | 14.657           | 0             | 776.34    | 166480        | 1340.1       | 1277.7         | 80.498    | 168500                                  | 301.18                                | 0.12 | depleted |
| 98A2105-063 | X09888       | REAL    | 7/1/98          | 55 GAL WITH ICE CREAM CONTAINERS, IN GOOD CONDITION, BOTTOM CONTAINERS BLACK DU CHIPS & TURNINGS, SAMPLED BOTTOM 8 CONTAINERS, 83 GAL OVERPACKED  | 0                                       | 24.396           | 0             | 1905.5    | 311460        | 3164.05      | 2308.75        | 198.175   | 323330                                  | 479                                   | 0.11 | depleted |

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T-1 Gamma Spectroscopy Data and Summary Information

| Sample #    | Inner Drum # | QC Type | Collection Date | Event Comment  | All gamma spectroscopy results in pCi/g |                  |               |                  |               |              | U-235 Detection | PA-234M Result | Detection | U mass ratio % (U-235/U-238) | Calculated Uranium Type DU/EU/Natural |
|-------------|--------------|---------|-----------------|--|---|------------------|---------------|------------------|---------------|--------------|-----------------|----------------|-----------|------------------------------|---------------------------------------|
|             |              |         |                 |  | AC-228 Result                           | AM-241 Detection | AM-241 Result | TH-234 Detection | TH-234 Result | U-235 Result |                 |                |           |                              |                                       |
| 98A2105-064 | X09888       | DUP     | 7/1/98          | 55 GAL WITH ICE CREAM CONTAINERS, IN GOOD CONDITION, BOTTOM CONTAINERS BLACK DU CHIPS & TURNINGS, SAMPLED BOTTOM 8 CONTAINERS, 83 GAL OVERPACKED   | 0                                       | 24.133           | 0             | 1907.2           | 306980        | 2235.4       | 316830          | 225.87         | 467.65    | 0.11                         | depleted                              |
| 98A2105-066 | X09885       | REAL    | 7/1/98          | 30 GAL IN 55 GAL OVERPACKED INTO 83 GAL. 30 GAL ABOUT 1/3 FULL OF BLACK PUDDING LIKE MATERIAL ON TOP, 1" BELOW FINE RED BROWN POWDER. SAMPLED BOTH MATERIALS   | 0                                       | 20.665           | 0             | 1359             | 258760        | 2017.6       | 257170          | 158.65         | 415.4     | 0.12                         | depleted                              |
| 98A2105-067 | X09864       | REAL    | 7/6/98          | 55 GAL DRUM W/ CARDBOARD ICE CREAM CONTAINERS AND SMALL AMOUNT OF SOIL. DRUM ABOUT 1/2 FULL OF CONTAINERS SOME BRIGHT GREEN GRANULAR DU. REMOVED ICE CREAM CONTAINERS W/ SAND PAPER PRIOR TO SAMPLING. SAMPLED FROM THREE CONTAINERS LOOSE DU.               | 0                                       | 18.392           | 0             | 847.86           | 179810        | 1407.9       | 187000          | 89.292         | 377.86    | 0.12                         | depleted                              |
| 98A2105-068 | X09863       | REAL    | 7/6/98          | 55 GAL DRUM FULL TO THE TOP W/ LIQUID, pH=8, PUMPED OFF LIQUID TO BOTTOM, LID LOOSE, DRUM FULL OF ICE CREAM CONTAINERS, REMOVED ICE CREAM CONTAINERS FROM TOP DOWN TO ABOUT 1/3 FULL, SAMPLED FROM BOTTOM CONTAINERS BLACK GRANULAR WET W/ TURNINGS          | 0                                       | 3.1059           | 0             | 26.546           | 2506.4        | 44.94        | 2519.9          | 2.7955         | 84.669    | 0.13                         | depleted                              |
| 98A2105-069 | X09851       | REAL    | 7/6/98          | 55 GAL 2/3 FULL OF ICE CREAM CONTAINERS, SOME SAND PAPER REMOVED, CONTAINERS HAVE GREEN GRANULAR DU AND BLACK FINE MATERIAL W/ NO RAD RESPONSE, SAMPLED GREEN MATERIAL, OVERPACKED INTO 83 GAL   | 0                                       | 15.074           | 0             | 748.06           | 147230        | 1254.1       | 145340          | 73.045         | 287.36    | 0.13                         | depleted                              |
| 98A2105-070 | X09826       | REAL    | 7/6/98          | SOIL AND PARTIAL DRUM CONTENTS IN B-12, SOME VISIBLE GREEN GRANULARS, DU AT SURFACE. SAMPLED FROM GREEN MATERIAL SOME MAYBE CONCRETED IN BALL.   | 0                                       | 16.214           | 0             | 984.44           | 186990        | 1425.3       | 186170          | 140.09         | 332.64    | 0.12                         | depleted                              |
| 98A2105-072 | X09893       | REAL    | 7/6/98          | DU 55 GAL DRUM 2/3 FULL OF DRY ICE CREAM CONTAINERS, SAMPLED FROM 4 CONTAINERS ON TOP OF DRUM, SAMPLED MOSTLY BLACK DU WITH SOME GREEN, ONE CONTAINER HAD SAND PAPER   | 0                                       | 16.679           | 0             | 903.72           | 182790        | 1589.4       | 181880          | 83.681         | 338.28    | 0.13                         | depleted                              |
| 98A2105-073 | X09875       | REAL    | 7/6/98          | 55 GAL DRUM PUMPED LIQUID OFF ICE CREAM CONTAINERS ABOUT 2/3 FULL OF ICE CREAM CONTAINERS, REMOVED ABOUT 1/2 THAT CONTAINED SAND PAPER, SAMPLED FROM 1 CONTAINER THAT HAS BLACK PEANUT BUTTER MATERIAL WITH GREEN GRANULAR MATERIAL. LIQUID INTO 55 GAL POLY | 0                                       | 14.447           | 0             | 749.84           | 161740        | 1318.3       | 162620          | 76.38          | 277.88    | 0.12                         | depleted                              |
| 98A2105-074 | X09807       | REAL    | 7/7/98          | B-12 WITH NON INTACT 30 GAL DRUM. DRUM HAD GREEN CHIPS + TURNINGS. BOTTOM 4" A BLACK SLUDGE/SOLID MATERIAL. SAMPLED EDGE OF GREEN TURNINGS AND BLACK SLUDGE. SAMPLED TRENCH SIDE.  | 0                                       | 16.169           | 0             | 752.16           | 159920        | 1815.9       | 159630          | 85.545         | 333.31    | 0.18                         | depleted                              |
| 98A2105-075 | X09856       | REAL    | 7/7/98          | 30 GAL OVERPACKED INTO 83 GAL. 30 GAL HALF FULL OF BLACK CHIPS + TURNINGS + SOIL. SOME DROPS OF LIQUIDS. SAMPLED BLACK TURNINGS.   | 0                                       | 15.3075          | 0             | 854.485          | 182740        | 2113.65      | 178850          | 92.047         | 311.435   | 0.18                         | depleted                              |



T-1 Gamma Spectroscopy Data and Summary Information

| All gamma spectroscopy results in pCi/g |              |         |                 |   |               |                         |                         |                        |                          |   |                                       |        |        |         |               |  |
|---|--------------|---------|-----------------|---|---------------|-------------------------|-------------------------|------------------------|--------------------------|---|---------------------------------------|--------|--------|---------|---------------|--|
| Sample #                                | Inner Drum # | QC Type | Collection Date | Event Comment   | AC-228 Result | AM-241 Detection Result | TH-234 Detection Result | U-235 Detection Result | PA-234M Detection Result | Calculated U mass ratio % (U-235/U-238) | Calculated Uranium Type DU/EU/Natural |        |        |         |               |  |
| 98A2105-076                             | X09890       | REAL    | 7/7/98          | 30 GAL FROM LANK. OIL + WATER IN DRUM, LID INTACT. GREEN TURNINGS 2/3 FULL. NO FREE LIQUID, SAMPLED DAMP GREEN TURNINGS   | 0             | 32.517                  | 0                       | 1116.7                 | 237750                   | 1963.4                                  | 2505                                  | 86.747 | 238630 | 690.16  | 0.16 depleted |  |
| 98A2105-079                             | D87702       | REAL    | 7/7/98          | 30 GAL OVERPACKED INTO NEW 55 GAL. 30 GAL 2/3 FULL OF BLACK GRANULAR PASTE, SOME GREEN. SAMPLED BLACK PASTE   | 0             | 15.635                  | 0                       | 902.7                  | 183570                   | 1578.6                                  | 2606.6                                | 59.919 | 184000 | 298.04  | 0.22 depleted |  |
| 98A2105-080                             | X09842       | REAL    | 7/7/98          | 30 GAL OVERPACKED INTO NEW 83 GAL OVERPACK. 30 GAL HAS 2/3 TO 3/4 FULL OF PH=4 LIQUID. PUMPED LIQUID INTO NEW POLY DRUM. SATURATED BLACK PASTE (PEANUT BUTTER) SOME TURNINGS. SAMPLED BLACK PASTE   | 0             | 14.329                  | 0                       | 728.95                 | 153800                   | 1292.1                                  | 1803.4                                | 60.758 | 161260 | 281.68  | 0.17 depleted |  |
| 98A2105-081                             | X09839       | REAL    | 7/7/98          | 30 GAL 2/3 FULL OF GREEN GRANULAR MATERIAL + SOIL, DRY. AT 2" DEEP MATERIAL BECOMES DARK GREEN/BLACK AND MOIST. SAMPLED UPPER 5" OF MIXTURE. OVERPACKED IN NEW 83 GAL.  | 0             | 17.973                  | 0                       | 987.09                 | 199830                   | 1767.7                                  | 2945.9                                | 93.006 | 201660 | 358.31  | 0.23 depleted |  |
| 98A2105-082                             | D88413       | REAL    | 7/8/98          | 40 GAL DRUM 3/4 FULL OF GREEN TURNINGS + DRY SOIL, TURNINGS SPRINGY, SPARKED DURING SAMPLING. SAMPLED TURNINGS. OVERPACKED INTO 55 GAL.   | 0             | 15.429                  | 0                       | 829.82                 | 142130                   | 1438                                    | 2070.7                                | 77.402 | 142710 | 304.19  | 0.23 depleted |  |
| 98A2105-083                             | D88407       | REAL    | 7/8/98          | 40 GAL WITH LID, 3/4 FULL OF HARD DENSE DARK GREEN BLACK DU W/ MINIMAL SOIL COVER. CHIPPED DU FOR SAMPLE, SOME SMALL TURNINGS MOIST.  | 0             | 15.715                  | 0                       | 788.1                  | 159960                   | 1422.4                                  | 2340.5                                | 88.761 | 167370 | 316.15  | 0.22 depleted |  |
| 98A2105-085                             | D88417       | REAL    | 7/8/98          | 40 GAL DRUM LID INTACT 1/2 FULL OF GREEN-BLACK "PEANUT BUTTER" DU + 6" SOIL. SAMPLED DRY SOIL AND DU INTERFACE. OVERPACKED INTO 55 GAL.   | 0             | 16.512                  | 0                       | 867.87                 | 179390                   | 1512.4                                  | 1696.6                                | 84.585 | 180690 | 333.76  | 0.15 depleted |  |
| 98A2105-086                             | D87699       | REAL    | 7/8/98          | 40 GAL 1/2 FULL OF DU, LID HAS FALLEN IN & DRUM TOP 1/2 FILLED W/ MUD, PUMPED LIQUID PH=7 INTO 55 GAL POLY, SAMPLED DU BELOW LID BLACK TO GREEN SATURATED ALL PEANUT BUTTER CONSISTENCY. OVERPACKED INTO 55 GAL BOTTLE 002 BROKEN, DRUM SEALED NOT RESAMPLED. | 0             | 13.9775                 | 0                       | 834.07                 | 168675                   | 1456.3                                  | 2355.95                               | 92.942 | 167500 | 278.615 | 0.22 depleted |  |
| 98A2105-087                             | D88425       | REAL    | 7/8/98          | 40 GAL WITH LID FULL OF DRY GREEN SPRINGY DU TURNINGS. SAMPLED GREEN TURNINGS, OVERPACKED INTO 55 GAL.  | 0             | 28.13                   | 0                       | 1704                   | 297530                   | 2976.6                                  | 3481.9                                | 176.79 | 298220 | 576.58  | 0.18 depleted |  |
| 98A2105-088                             | D88387       | REAL    | 7/8/98          | 40 GAL LID INTACT 2/3 FULL OF BRIGHT GREEN SPRINGY TURNINGS + SOME SOIL, SOME SPARKS DURING SAMPLING, DU ON TOP DRY, AT 6" DEEP DAMP. SAMPLED TURNINGS. OVERPACKED INTO 55 GAL.   | 0             | 26.758                  | 0                       | 1336                   | 231890                   | 2311.5                                  | 2999.4                                | 149.38 | 267920 | 520.07  | 0.17 depleted |  |
| 98A2105-089                             | D88388       | REAL    | 7/8/98          | 40 GAL WITH LID ABOUT 2/3 FULL OF DRY GREEN SPRINGY TURNINGS, WHOLE DRUM DRY, SAMPLED TURNINGS  | 0             | 29.681                  | 0                       | 1917.7                 | 314940                   | 3337.1                                  | 4325.7                                | 209.24 | 317130 | 620.68  | 0.21 depleted |  |
| 98A2105-091                             | D88418       | REAL    | 7/8/98          | 40 GAL WITH LID 1/2 FULL IF DU W/ LIQUID NON PUMPABLE+SOIL. SAMPLED SATURATED BLACK PASTE   | 0             | 15.179                  | 0                       | 882.56                 | 181930                   | 1546.5                                  | 2281.3                                | 74.817 | 179070 | 303.41  | 0.20 depleted |  |
| 98A2105-092                             | D88414       | REAL    | 7/8/98          | 40 GAL 2/3 FULL OF SATURATED GREEN SPRINGY TURNINGS, LIQUID 6" BELOW SURFACE NOT PUMPABLE, SAMPLED SATURATED TURNINGS   | 0             | 23.597                  | 0                       | 1596.9                 | 285220                   | 2780                                    | 4103.1                                | 148.24 | 280980 | 460.4   | 0.23 depleted |  |
| 98A2105-093                             | D88410       | REAL    | 7/8/98          | 40 GAL 3/4 FULL OF GREEN/DRY SPRINGY TURNINGS. SAMPLED TURNINGS. SPARKS DURING SMAPLING. OVERPACKED IN 55 GAL   | 0             | 29.311                  | 0                       | 1722.9                 | 296680                   | 3157.4                                  | 3552                                  | 118.4  | 297050 | 593.96  | 0.19 depleted |  |

T-1 Gamma Spectrometry Data and Comparison Information

| Inner       |        | QC   | Collection | All gamma spectroscopy results in pCi/g             |   |        |         |        |         |         |           |         |           |        |              | Calculated   | Calculated |
|-------------|--------|------|------------|---|---|--------|---------|--------|---------|---------|-----------|---------|-----------|--------|--------------|--------------|------------|
| Sample #    | Drum # | Type | Date       | Event   | Comment   | AC-228 | AM-241  | TH-234 | U-235   | PA-234M | Detection | Result  | Detection | Result | U mass ratio | Uranium Type |            |
| 98A2105-094 | D88415 | REAL | 7/8/98     | 40 GAL 3/4 FULL OF DRY GREEN SPRING TURNINGS        | SAMPLED TURNINGS, OVERPACKED INTO 55 GAL          | 0      | 25.8    | 0      | 1528.7  | 299210  | 2702.7    | 3171.3  | 172.03    | 299020 | 511.24       | 0.16         |            |
| 98A2105-095 | D87710 | REAL | 7/9/98     | 30 GAL DRY DARK GREENISH CHIPS + TURNINGS,          | OVERPACKED INTO 55 GAL                            | 0      | 28.175  | 0      | 1914    | 316660  | 3381.4    | 4199.8  | 201.96    | 314390 | 546.51       | 0.21         |            |
| 98A2105-097 | D88405 | REAL | 7/9/98     | 30 GAL DRY GREENISH/YELLOWISH TURNINGS, POWDERY     | ON TOP, MOIST BELOW SURFACE, SAMPLED GREENISH +   | 0      | 14.676  | 0      | 779.89  | 162150  | 1318.2    | 2310.8  | 97.005    | 161870 | 286.37       | 0.22         |            |
| 98A2105-098 | D88416 | REAL | 7/9/98     | 30 GAL COARSE TURNINGS ON TOP, DAMP, CONSOLIDATED   | BELOW SURFACE, PASTEY                             | 0      | 15.632  | 0      | 840.19  | 172300  | 1465      | 2611.3  | 83.154    | 183190 | 311.6        | 0.22         |            |
| 98A2105-099 | D88412 | REAL | 7/9/98     | 30 GAL 3/4 FULL OF GREEN/YELLOW DRY TURNINGS        | THROUGHOUT DRUM, OVERPACKED INTO 55 GAL           | 0      | 26.6015 | 0      | 1684.25 | 296410  | 2924.7    | 3861.15 | 180.53    | 296725 | 530.205      | 0.21         |            |
| 98A2105-100 | D88412 | DUP  | 7/9/98     | 30 GAL 3/4 FULL OF GREEN/YELLOW DRY TURNINGS        | THROUGHOUT DRUM, OVERPACKED INTO 55 GAL           | 0      | 26.822  | 0      | 1549    | 281450  | 2706.9    | 3382.9  | 127.32    | 292280 | 545.46       | 0.18         |            |
| 98A2105-101 | D88419 | REAL | 7/9/98     | 30 GAL DRY GREENISH/YELLOWISH TURNINGS, DRUM        | ABOUT 80% FULL, OVERPACKED INTO 55 GAL            | 0      | 26.38   | 0      | 1784.9  | 307280  | 3157.1    | 3459.7  | 189.63    | 317310 | 547.52       | 0.17         |            |
| 98A2105-102 | D88420 | REAL | 7/9/98     | 30 GAL 3/4 FULL OF DRY GREEN/YELLOW TURNINGS,       | OVERPACKED INTO 55 GAL                            | 0      | 24.931  | 0      | 1707.2  | 295810  | 3011      | 3654.5  | 224.39    | 303210 | 494.72       | 0.19         |            |
| 98A2105-104 | D88411 | REAL | 7/9/98     | 30 GAL 2/3 FULL OF COARSE GREEN TURNINGS ON TOP,    | FINER YELLOWISH MATERIAL NEAR BOTTOM,             | 0      | 19.705  | 0      | 1127.1  | 225430  | 1993      | 2126.6  | 193.12    | 223870 | 410.31       | 0.15         |            |
| 98A2105-105 | D88406 | REAL | 7/9/98     | 30 GAL 2/3 FULL OF GREEN/YELLOW DRY TURNINGS NEAR   | TOP, AND BLACKISH SLIGHTLY DAMP MATERIAL BELOW    | 0      | 17.331  | 0      | 916.26  | 187320  | 1619.6    | 2729.3  | 75.737    | 183460 | 362.43       | 0.23         |            |
| 98A2105-106 | D92869 | REAL | 7/9/98     | 30 GAL 1/2 FULL SURFACE GREEN TURNINGS, BELOW       | SURFACE SLIGHTLY DAMP AND CONSOLIDATED,           | 0      | 17.101  | 0      | 783.46  | 174230  | 2062.2    | 2928.2  | 109.09    | 180140 | 321.75       | 0.25         |            |
| 98A2105-107 | D92857 | REAL | 7/9/98     | 30 GAL 1/2 FULL SURFACE YELLOW/GREEN DRY TURNINGS,  | 4" BELOW SURFACE DARKER BLACK SLIGHTLY MOIST AND  | 0      | 23.271  | 0      | 1695.6  | 283460  | 2940      | 3430    | 174.57    | 298540 | 463.24       | 0.18         |            |
| 98A2105-108 | D92858 | REAL | 7/9/98     | 30 GAL 1/2 FULL OF MOIST BLACK GRANULAR MATERIAL,   | OVERPACKED INTO 55 GAL                            | 0      | 13.902  | 0      | 804.71  | 162960  | 1417.3    | 2269.4  | 90.802    | 160030 | 274.32       | 0.22         |            |
| 98A2105-110 | D92884 | REAL | 7/9/98     | 30 GAL 1/2 FULL OF DAMP DARK GREEN TO BLACK         | GRANULAR MATERIAL, OVERPACKED INTO 55 GAL         | 0      | 15.95   | 0      | 939.75  | 186690  | 1607.8    | 2513.8  | 106.73    | 188190 | 310.16       | 0.21         |            |
| 98A2105-111 | D92864 | DUP  | 7/9/98     | 30 GAL 1/2 FULL OF DAMP DARK GREEN TO BLACK         | GRANULAR MATERIAL, OVERPACKED INTO 55 GAL         | 0      | 18.343  | 0      | 1089.85 | 215310  | 1903.2    | 2834.35 | 122.494   | 217775 | 361.61       | 0.20         |            |
| 98A2105-112 | D92860 | REAL | 7/9/98     | 30 GAL 1/3 FULL OF BLACK PASTE, OVERPACKED INTO 55  | GAL   | 0      | 14.854  | 0      | 840.46  | 173040  | 1457.3    | 2401.1  | 83.573    | 177870 | 297.88       | 0.21         |            |
| 98A2105-113 | D92861 | REAL | 7/9/98     | 30 GAL DRUM 1/2 FULL OF BLACK PASTEY MATERIAL WHICH | WAS SAMPLED, PUMPED LIQUID PH=4 OUT OF DRUM. HIGH | 0      | 14.746  | 0      | 815.06  | 176020  | 1483.5    | 2355.8  | 76.972    | 173370 | 290.93       | 0.21         |            |
| 98A2105-114 | D92859 | REAL | 7/9/98     | 30 GAL 1/2 FULL OF BLACK STICKY PASTE, TARRY,       | OVERPACKED INTO 55 GAL                            | 0      | 14.989  | 0      | 817.38  | 166550  | 1366.9    | 2294.2  | 73.687    | 167900 | 288.59       | 0.21         |            |
| 98A2105-115 | D92865 | REAL | 7/13/98    | 30 GAL 2/3 FULL YELLOW/GREEN DRY TURNINGS AND       | POWDER, TURNINGS SPARKED WHEN BROKEN, TYPICAL     | 0      | 28.006  | 0      | 1874.4  | 331960  | 3369.5    | 3004    | 218.37    | 338470 | 546.23       | 0.14         |            |

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T-1 Gamma Spectroscopy Data and Summary Information

| Sample #    | Inner Drum # | QC Type | Collection Date | Event Comment  | All gamma spectroscopy results in pCi/g |                  |               |                  | PA-234M Result | Detection        | U-235 Result  | Detection        | U-235 Result  | Detection        | U mass ratio % (U-235/U-238) | Calculated Uranium Type |
|-------------|--------------|---------|-----------------|--|---|------------------|---------------|------------------|----------------|------------------|---------------|------------------|---------------|------------------|------------------------------|-------------------------|
|             |              |         |                 |  | AC-228 Result                           | AM-241 Detection | AM-241 Result | TH-234 Detection | TH-234 Result  | TH-234 Detection | TH-234 Result | TH-234 Detection | TH-234 Result | TH-234 Detection | TH-234 Result                | TH-234 Detection        |
| 98A2105-117 | D92868       | REAL    | 7/13/98         | 30 GAL 1/2 FULL OF DRY BLACK POWDER WITH A FEW VERY FINE TURNINGS, LIMITED SPARKS DURING SAMPLING DUE TO FINER MORE POWDER, OVERPACKED INTO 55 GAL                       | 0                                       | 22.399           | 0             | 1205.7           | 244970         | 2104.7           | 2465.8        | 126.19           | 247520        | 446.92           | 0.15                         | depleted                |
| 98A2105-118 | D92863       | REAL    | 7/13/98         | 30 GAL 2/3 FULL OF YELLOW/GREEN AND BLACK DAMP TURNINGS, SPARKED WHEN BROKEN, TYPICAL OF DU TURNINGS, OVERPACKED INTO 55 GAL   | 0                                       | 27.548           | 0             | 1507.1           | 291760         | 2640.9           | 2810.5        | 135.51           | 297300        | 583.45           | 0.15                         | depleted                |
| 98A2105-119 | D92862       | REAL    | 7/13/98         | 30 GAL YELLOW/GREEN DRY TURNINGS, SPARKED WHEN BROKEN, TYPICAL OF DU TURNINGS, OVERPACKED INTO 55 GAL  | 0                                       | 25.062           | 0             | 1726.4           | 295210         | 3036.7           | 3250.8        | 161.32           | 304250        | 515.22           | 0.17                         | depleted                |
| 98A2105-120 | D92854       | REAL    | 7/13/98         | 30 GAL 2/3 FULL OF GREENISH BLACK TURNINGS, MOIST, LIQUID NOT PUMPABLE PH=4, TURNINGS TOO WET TO SPARK, OVERPACKED INTO 55 GAL   | 0                                       | 15.243           | 0             | 820.62           | 171610         | 1458.3           | 2285.6        | 107.68           | 177720        | 291.73           | 0.20                         | depleted                |
| 98A2105-121 | D92855       | REAL    | 7/14/98         | 30 GAL 2/3 FULL OF DRY YELLOW/GREEN COARSE TURNINGS, SPARKED, BOTTLE 003 BROKEN AND DRUM UNABLE TO RESAMPLE, 55 GAL OVERPACK SEALED                                      | 0                                       | 29.346           | 0             | 1913             | 323550         | 3303.7           | 4127.8        | 186.03           | 334010        | 575.45           | 0.19                         | depleted                |
| 98A2105-123 | D92870       | REAL    | 7/14/98         | 30 GAL 2/3 FULL OF GREEN TO DARK GREY CHIPS AND GRANULAR MATERIAL MOIST AND DAMP, OVERPACKED INTO 55 GAL   | 0                                       | 14.548           | 0             | 760.2            | 150290         | 1383.7           | 1708.6        | 77.269           | 176210        | 286.74           | 0.15                         | depleted                |
| 98A2105-124 | D92853       | REAL    | 7/14/98         | 30 GAL YELLOW/GREEN FINE TURNINGS, DRY ON TOP, AT 4" DEPTH DAMP, MODERATE SPARKING WHEN DISTURBED, OVERPACKED INTO 55 GAL  | 0                                       | 27.141           | 0             | 1447.2           | 318330         | 2567.75          | 4481.5        | 140.84           | 322180        | 545.155          | 0.22                         | depleted                |
| 98A2105-125 | D92871       | REAL    | 7/14/98         | 30 GAL 2/3 FULL OF DAMP COARSE AND FINE YELLOW/GREEN TURNINGS, NO SPARKS, OVERPACKED INTO 55 GAL   | 0                                       | 27.458           | 0             | 1720.8           | 308630         | 3046.5           | 4523          | 230.73           | 304760        | 546.38           | 0.23                         | depleted                |
| 98A2105-126 | D92866       | REAL    | 7/14/98         | 30 GAL 1/2 FULL OF DRY MIXTURE OF COARSE AND FINE YELLOW/GREEN TURNINGS, MODERATE SPARKING, OVERPACKED INTO 55 GAL   | 0                                       | 26.549           | 0             | 1801.3           | 321420         | 3108.4           | 4149.5        | 186.87           | 328510        | 527.66           | 0.20                         | depleted                |
| 98A2105-127 | D92852       | REAL    | 7/16/98         | 30 GAL 2/3 FULL OF DRY DARK GREEN COARSE TURNINGS WITH 20-30% FINES, FINES INCREASE WITH DEPTH, MODERATE SPARKING, LOS ALAMOS DRUM, OVERPACKED INTO 55 GAL               | 0                                       | 28.688           | 0             | 1819.15          | 310045         | 3278             | 4169.95       | 176.355          | 332270        | 568.305          | 0.20                         | depleted                |
| 98A2105-129 | D93262       | REAL    | 7/16/98         | 30 GAL 90% FULL OF DRY COARSE YELLOW/GREEN TURNINGS ABOUT 40% FINES, SPARKED WHEN SAMPLED, DUSTIER THAN PREVIOUS, DRUM IMPRINTED WITH LOS ALAMOS, OVERPACKED INTO 55 GAL | 0                                       | 28.092           | 0             | 1814.5           | 306450         | 3210.4           | 4203.5        | 176.46           | 313790        | 560.72           | 0.21                         | depleted                |
| 98A2105-130 | D93269       | REAL    | 7/16/98         | 30 GAL 50% FULL OF DRY HARD GRANULAR YELLOW/GREEN AND DARKER MATERIAL, LOS ALAMOS DRUM, OVERPACKED INTO 55 GAL   | 0                                       | 18.613           | 0             | 1076.3           | 214500         | 1934.7           | 3114          | 96.547           | 208700        | 367.55           | 0.23                         | depleted                |
| 98A2105-131 | D93264       | REAL    | 7/16/98         | 30 GAL DEFORMED 1/2 FULL OF COARSE DARK GREEN AND BLACKISH TURNINGS, DRY AT SURFACE UNABLE TO PENETRATE FURTHER, OVERPACKED INTO 55 GAL                                  | 0                                       | 24.327           | 0             | 1291.8           | 253580         | 2431             | 3421.6        | 148.58           | 299630        | 521.83           | 0.18                         | depleted                |
| 98A2105-132 | D93274       | REAL    | 7/20/98         | 30 GAL 3/4 FULL OF DRY, FINE DARK GREEN + SOME FINE LIGHT GREEN TURNINGS, SPARKED WHEN SAMPLED, OVERPACKED INTO 55 GAL   | 0                                       | 28.273           | 0             | 1902.8           | 320210         | 3313.2           | 4568.9        | 260.58           | 334850        | 585.09           | 0.21                         | depleted                |
| 98A2105-133 | D93270       | REAL    | 7/20/98         | 30 GAL 80%-90% FULL OF DAMP DARK GREEN AND BLACK CHIPS, TURNINGS AND FINES, "PEANUT BUTTER" CONSISTENCY, NO SPARKS, OVERPACKED INTO 55 GAL                               | 0                                       | 14.161           | 0             | 818.83           | 161230         | 1414.1           | 2010.7        | 78.427           | 164980        | 284.53           | 0.19                         | depleted                |

T-1 Gamma Spectroscopy Data and Summary Information

| 1-7 Gamma Spectroscopy Data and Summary Information |              |         |                 |  |   |               |               |              |           |         |           |         |           |        |                |           |   |                                       |  |
|---|--------------|---------|-----------------|--|---|---------------|---------------|--------------|-----------|---------|-----------|---------|-----------|--------|----------------|-----------|---|---------------------------------------|--|
| Sample #  | Inner Drum # | QC Type | Collection Date | Event Comment  | All gamma spectroscopy results in pCi/g |               |               |              |           |         |           |         |           |        | PA-234M Result | Detection | Calculated U mass ratio % (U-235/U-238) | Calculated Uranium Type DU/EU/Natural |  |
|   |              |         |                 |  | AC-228 Result                           | AM-241 Result | TH-234 Result | U-235 Result | Detection | Result  | Detection | Result  | Detection | Result |                |           |   |                                       |  |
| 98A2105-153   | D93281       | DUP     | 7/21/98         | DRUM 2/3 FULL OF DRY COARSE TO FINE YELLOW/GREEN TURNINGS, SPARKED, OVERPACKED INTO 55 GAL.  | 0                                       | 28.975        | 0             | 1887.9       | 314490    | 3242    | 4415.8    | 185.98  | 312650    | 604.23 | 0.22           | depleted  |   |                                       |  |
| 98A2105-155   | D93272       | REAL    | 7/22/98         | 30 GAL 1/2 FULL OF BLACKISH WET SATURATED PASTE, NO SPARKS, OVERPACKED INTO 55 GAL.  | 0                                       | 15.041        | 0             | 803.04       | 165220    | 1490.6  | 2036.7    | 94.83   | 165470    | 324.18 | 0.19           | depleted  |   |                                       |  |
| 98A2105-156   | D93267       | REAL    | 7/22/98         | 30 GAL 1/2 FULL DRY, BLACK AND DARK GREEN COARSE TURNINGS GRADING TO BLACK POWDER AT 6", SPARKED, OVERPACKED INTO 55 GAL.                                      | 0                                       | 30.576        | 0             | 1889.5       | 326320    | 3255.7  | 3655.3    | 207.04  | 337370    | 616.99 | 0.17           | depleted  |   |                                       |  |
| 98A2105-157   | D93278       | REAL    | 7/22/98         | 30 GAL DRY COARSE GREEN AND DARK TURNINGS WITH SOME FINES, SPARKED, OVERPACKED INTO 55 GAL.  | 0                                       | 28.492        | 0             | 1654.4       | 337580    | 2971.1  | 4292.9    | 159.66  | 332650    | 566.75 | 0.20           | depleted  |   |                                       |  |
| 98A2105-158   | D93279       | REAL    | 7/22/98         | 30 GAL 2/3 FULL OF BLACK MOIST TURNINGS, 1/2 COARSE HALF GRANULAR, SPARKED, OVERPACKED INTO 55 GAL.  | 0                                       | 26.077        | 0             | 1541.9       | 322750    | 2734.2  | 4199.8    | 202.25  | 319560    | 538.47 | 0.20           | depleted  |   |                                       |  |
| 98A2105-159   | D93283       | REAL    | 7/22/98         | 30 GAL 1/2 FULL OF MOIST BLACK, MIXTURE OF TURNINGS, CHIPS AND POWDER (50%), NO SPARKS, OVERPACKED INTO 55 GAL.  | 0                                       | 28.242        | 0             | 1911.8       | 325540    | 3293.2  | 4765.2    | 237.04  | 331300    | 565.91 | 0.22           | depleted  |   |                                       |  |
| 98A2105-161   | D93285       | REAL    | 7/22/98         | 30 GAL 90% FULL OF DRY COARSE BLACK AND GREEN TURNINGS, SPARKED, SPRING, OVERPACKED INTO 55 GAL.   | 0                                       | 19.433        | 0             | 1101.8       | 248600    | 1896.2  | 2634      | 122.7   | 246970    | 408.65 | 0.17           | depleted  |   |                                       |  |
| 98A2105-162   | D93277       | REAL    | 7/22/98         | 30 GAL 90% FULL OF DRY COARSE BLACK AND GREEN TURNINGS, SPARKED, SPRING, OVERPACKED INTO 55 GAL.   | 0                                       | 27.454        | 0             | 1448.5       | 304260    | 2539.9  | 3308.9    | 104.18  | 301730    | 562.99 | 0.17           | depleted  |   |                                       |  |
| 98A2105-163   | D93277       | DUP     | 7/22/98         | 30 GAL BLACK STICKY PASTE WITH PEANUT BUTTER CONSISTENCY, NO SPARKS, OVERPACKED INTO 55 GAL.   | 0                                       | 29.484        | 0             | 1530.6       | 319880    | 2839.8  | 4633      | 131.79  | 318390    | 600.04 | 0.23           | depleted  |   |                                       |  |
| 98A2105-164   | D93287       | REAL    | 7/22/98         | 30 GAL 1/2 FULL OF MOIST YELLOW/GREEN GRANULAR COHESIVE MATERIAL, DENSELY PACKED, DIFFICULT TO PENETRATE MORE THAN 8" DEEP, NO SPARKS, OVERPACKED INTO 55 GAL. | 0                                       | 15.2845       | 0             | 855.545      | 169865    | 1462.1  | 2224.3    | 95.1885 | 172345    | 298.98 | 0.20           | depleted  |   |                                       |  |
| 98A2105-165   | D93286       | REAL    | 7/22/98         | 30 GAL 1/2 FULL OF HARD CONSOLIDATED DARK GREEN TO BROWN/BLACK GRANULAR, NO SPARKS, SAMPLES HAD TO BE CHIPPED LOOSE, OVERPACKED INTO 55 GAL.                   | 0                                       | 16.769        | 0             | 917.45       | 182540    | 1633.3  | 1958.9    | 107.3   | 181610    | 343.91 | 0.17           | depleted  |   |                                       |  |
| 98A2105-166   | D93288       | REAL    | 7/22/98         | 30 GAL 1/2 FULL OF HARD CONSOLIDATED DARK GREEN TO BROWN/BLACK GRANULAR, NO SPARKS, SAMPLES HAD TO BE CHIPPED LOOSE, OVERPACKED INTO 55 GAL.                   | 0                                       | 18.404        | 0             | 1014.3       | 199480    | 1790.5  | 2838.2    | 92.786  | 207300    | 379.52 | 0.21           | depleted  |   |                                       |  |
| 98A2105-167   | D93288       | DUP     | 7/22/98         | 30 GAL 1/2 FULL OF HARD CONSOLIDATED DARK GREEN TO BROWN/BLACK GRANULAR, NO SPARKS, SAMPLES HAD TO BE CHIPPED LOOSE, OVERPACKED INTO 55 GAL.                   | 0                                       | 19.672        | 0             | 1125.2       | 213530    | 2029    | 2789.8    | 119.2   | 221480    | 411.84 | 0.20           | depleted  |   |                                       |  |
| 98A2105-169   | D93284       | REAL    | 7/22/98         | 30 GAL 80% FULL OF MIXED DRY YELLOW/GREEN COARSE, MEDIUM AND FINE TURNINGS, OVERPACKED INTO 55 GAL.  | 0                                       | 20.742        | 0             | 1381.6       | 340110    | 2377.9  | 3785.6    | 135.94  | 351240    | 412.12 | 0.17           | depleted  |   |                                       |  |
| 98A2105-170   | D93280       | REAL    | 7/22/98         | 30 GAL 2/3 FULL OF DRY YELLOW/GREEN TURNINGS TO 4" FROM BOTTOM, BOTTOM 4" MOIST/WET, SAMPLED UPPER LAYER, SPARKED, OVERPACKED INTO 55 GAL.                     | 0                                       | 24.604        | 0             | 1317.2       | 329140    | 2320.3  | 2828.8    | 114.28  | 318630    | 524.02 | 0.14           | depleted  |   |                                       |  |
| 98A2105-171   | D93462       | REAL    | 7/22/98         | 30 GAL 2/3 FULL FAIRLY DRY YELLOW/GREEN TURNINGS AND GRANULARS, NO SPARKS, OVERPACKED INTO 55 GAL.   | 0                                       | 20.7965       | 0             | 1096.75      | 228360    | 1921.55 | 2216.65   | 107.724 | 219360    | 420.67 | 0.16           | depleted  |   |                                       |  |
| 98A2105-172   | X10374       | REAL    | 7/28/98         | 55 GAL 2/3 FULL OF COARSE BLACK AND GREENISH TURNINGS, DRY FROM SURFACE TO BOTTOM, FEW SPARKS WHEN SAMPLED, OVERPACKED INTO 85 GAL.                            | 0                                       | 26.657        | 0             | 1667.4       | 324890    | 2885.4  | 3444.9    | 153.9   | 324010    | 532.1  | 0.17           | depleted  |   |                                       |  |

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T-1 Gamma Spectroscopy Data and Summary Information

| Sample #    | Inner Drum # | QC Type | Collection Date | Event Comment  | All gamma spectroscopy results in pCi/g |                  |               |                  |               |               | PA-234M Result | Detection | U-235 Result | Detection | U-235 Result | Detection | U mass ratio<br>%(U-235/U-238) | Calculated Uranium Type<br>DUEU/Natural |
|-------------|--------------|---------|-----------------|--|---|------------------|---------------|------------------|---------------|---------------|----------------|-----------|--------------|-----------|--------------|-----------|--------------------------------|---|
|             |              |         |                 |  | AC-228 Result                           | AM-241 Detection | AM-241 Result | TH-234 Detection | TH-234 Result | TH-234 Result |                |           |              |           |              |           |                                |   |
| 98A2105-135 | D93271       | REAL    | 7/20/98         | 30 GAL 50% FULL OF DRY TO DAMP BLACK MATERIAL, NO SPARKS, OVERPACKED INTO 55 GAL.  | 0                                       | 17.575           | 0             | 1191             | 206860        | 2053          | 3578.8         | 116.39    | 214930       | 379.01    |              |           | 0.26                           | depleted                                |
| 98A2105-136 | D93276       | REAL    | 7/20/98         | 30 GAL 2/3 FULL OF DRY BLACK/GREEN AND GREY TURNINGS, SPARKED WHEN DISTURBED, OVERPACKED INTO 55 GAL.  | 0                                       | 26.806           | 0             | 1907.3           | 317490        | 3243.5        | 3891.7         | 161.97    | 327860       | 532.79    |              |           | 0.18                           | depleted                                |
| 98A2105-137 | D93266       | REAL    | 7/20/98         | 30 GAL 40%-50% FULL OF DAMP DARK GREEN AND BLACK COHESIVE MATERIAL, LIQUID PH-3 PUMPED OFF 10 GALLONS, 4" TO 6" OF WET SLUDGE AT BOTTOM, PLASTIC LINER INTACT, MOST INTACT DRUM TO DATE, OVERPACKED INTO 55 GAL. | 0                                       | 18.266           | 0             | 1229.4           | 223970        | 2113.2        | 1937.3         | 131.25    | 222440       | 345.96    |              |           | 0.14                           | depleted                                |
| 98A2105-138 | D93282       | REAL    | 7/21/98         | 30 GAL 2/3 FULL OF LARGER YELLOW/GREEN TURNINGS ON SURFACE, FINELY DIVIDED DAMP GRANULAR MATERIAL BELOW SURFACE, MODERATE SOIL FRACTION MIXED, NO SPARKS, OVERPACKED INTO 55 GAL.                                | 0                                       | 17.37            | 0             | 824.83           | 176020        | 1461.1        | 2063.1         | 72.878    | 173510       | 361.77    |              |           | 0.18                           | depleted                                |
| 98A2105-139 | D93280       | REAL    | 7/21/98         | 30 GAL 80% FULL DRY YELLOW/GREEN TURNINGS, SPARKED, OVERPACKED INTO 55 GAL.  | 0                                       | 20.141           | 0             | 1245.4           | 207340        | 2228.1        | 2930.6         | 116.07    | 206450       | 418.9     |              |           | 0.22                           | depleted                                |
| 98A2105-141 | D92856       | REAL    | 7/21/98         | 30 GAL 2/3 FULL OF POWDERY, MOIST BLACK/GREEN/YELLOW GRANULAR MATERIAL, NO SPARKING, OVERPACKED INTO 55 GAL.   | 0                                       | 21.128           | 0             | 1312.5           | 242310        | 11938         | 3532.9         | 117.83    | 244980       | 418.15    |              |           | 0.22                           | depleted                                |
| 98A2105-142 | D93259       | REAL    | 7/21/98         | 30 GAL DRUM WITH 2-3 GAL OF PH-7 LIQUID, DRUM 1/2 FULL, LARGE FRACTION OF MUD, DU PEANUT BUTTER CONSISTENCY, NO SPARKS, OVERPACKED INTO 55 GAL.  | 0                                       | 15.054           | 0             | 801.33           | 164030        | 1460.2        | 2332           | 55.415    | 170440       | 309.95    |              |           | 0.21                           | depleted                                |
| 98A2105-143 | D93261       | REAL    | 7/21/98         | 30 GAL 2/3 FULL OF DRY COARSE TO FINE YELLOW/GREEN TURNINGS, SPARKED, OVERPACKED INTO 55 GAL.  | 0                                       | 27.585           | 0             | 1783.4           | 338790        | 3104.1        | 4600.9         | 181.45    | 340320       | 547.62    |              |           | 0.21                           | depleted                                |
| 98A2105-145 | D93263       | REAL    | 7/21/98         | 30 GAL 2/3 FULL OF DRY COARSE BLACK TURNINGS ON SURFACE WITH FINE GRANULAR MATERIAL BELOW SURFACE (ABOUT 6"). SPARKED WHEN SAMPLED, OVERPACKED INTO 55 GAL.  | 0                                       | 22.489           | 0             | 1325.3           | 249720        | 2432.9        | 2685.8         | 142.91    | 248840       | 502.4     |              |           | 0.17                           | depleted                                |
| 98A2105-146 | D92867       | REAL    | 7/21/98         | 30 GAL 80% FULL OF DRY COARSE GREEN TURNINGS, SPARKED, OVERPACKED INTO 55 GAL.   | 0                                       | 27.062           | 0             | 1681.4           | 331640        | 2929.6        | 4411.3         | 172.38    | 333020       | 543.92    |              |           | 0.21                           | depleted                                |
| 98A2105-148 | D93273       | REAL    | 7/21/98         | 30 GAL 50% FULL OF DRY COARSE TURNINGS ON SURFACE TO GRANULAR MATERIAL BELOW SURFACE, YELLOW/GREEN, NO SPARKS, OVERPACKED INTO 55 GAL.   | 0                                       | 27.713           | 0             | 1905.8           | 311180        | 3304.6        | 4499.8         | 209       | 320270       | 576.43    |              |           | 0.22                           | depleted                                |
| 98A2105-149 | D93265       | REAL    | 7/21/98         | 30 GAL 2/3 FULL OF DRY COARSE TO FINE YELLOW/GREEN TURNINGS, SPARKED, OVERPACKED INTO 55 GAL.  | 0                                       | 22.665           | 0             | 1550.95          | 334280        | 2652.1        | 4319.6         | 161.6     | 339745       | 447.74    |              |           | 0.20                           | depleted                                |
| 98A2105-150 | D93275       | REAL    | 7/21/98         | 30 GAL 2/3 FULL OF DRY MIXED COARSE AND MEDIUM SEGREGATED DARK GREEN TURNINGS, SPARKED, OVERPACKED INTO 55 GAL.  | 0                                       | 30.912           | 0             | 1867.6           | 319430        | 3276.5        | 3464.9         | 165.15    | 321790       | 635.66    |              |           | 0.17                           | depleted                                |
| 98A2105-151 | D93268       | REAL    | 7/21/98         | DRUM 1/2 FULL OF WET BLACK PASTE, MOISTURE INCREASES WITH DEPTH, NO SPARKS, OVERPACKED INTO 55 GAL.  | 0                                       | 16.757           | 0             | 937.89           | 191200        | 1654.9        | 2616.3         | 94.678    | 188510       | 359.25    |              |           | 0.22                           | depleted                                |
| 98A2105-152 | D93281       | REAL    | 7/21/98         | DRUM 2/3 FULL OF DRY COARSE TO FINE YELLOW/GREEN TURNINGS, SPARKED, OVERPACKED INTO 55 GAL.  | 0                                       | 25.304           | 0             | 1591.9           | 319040        | 2743.2        | 4154.4         | 194.89    | 323050       | 553       |              |           | 0.20                           | depleted                                |

T-1 Gamma Spectroscopy Data and Summary Information

| Sample #    | Inner Drum # | QC Type | Collection Date | Event Comment   | All gamma spectroscopy results in pCi/g |                  |               |                  |               |                 | PA-234M Result | Detection         | U-235 Result    | Detection    | U mass ratio % (U-235/U-238) | Calculated Uranium Type |
|-------------|--------------|---------|-----------------|---|---|------------------|---------------|------------------|---------------|-----------------|----------------|-------------------|-----------------|--------------|------------------------------|-------------------------|
|             |              |         |                 |   | AC-228 Result                           | AM-241 Detection | AM-241 Result | TH-234 Detection | TH-234 Result | U-235 Detection | U-235 Result   | PA-234M Detection | U-235 Detection | U-235 Result | U mass ratio % (U-235/U-238) |                         |
| 98A2105-173 | X10371       | REAL    | 7/28/98         | 55 GAL 1/2 FULL OF WET BLACK DU CHIPS AND POWDER, SURFACE GREEN AND YELLOW, NO PUMPABLE LIQUIDS, NO SPARKS, OVERPACKED INTO 85 GAL.   | 0                                       | 16.678           | 0             | 913.18           | 187840        | 1547.4          | 2222.8         | 122.98            | 339.95          | 181190       | 0.19                         | depleted                |
| 98A2105-176 | X09806       | REAL    | 7/29/98         | 8-12 GREEN AND YELLOW GRANULAR DAMP MATERIAL, SLIGHTLY COHESIVE, NO SPARKS, DRUM 1/3 FULL, MAJORITY OF DU WAS IN A SOLID MASS VERY COMPACT.   | 0                                       | 16.855           | 0             | 786.66           | 161670        | 1426.6          | 1774.1         | 52.411            | 345.86          | 172770       | 0.16                         | depleted                |
| 98A2105-177 | D93457       | REAL    | 7/30/98         | 30 GAL 1/2 FULL OF GREEN/BROWN AND BLACK TURNINGS AND GRANULAR MATERIAL, SLIGHTLY DAMP, NO SPARKS, DRUM ABOUT 30%-40% FULL OF TRASH MATERIAL, PAPER WIPES, SAND PAPER, OVERPACKED INTO 55 GAL.  | 0                                       | 18.853           | 0             | 936.99           | 182550        | 1684.3          | 3015           | 100.13            | 377.98          | 180920       | 0.26                         | depleted                |
| 98A2105-178 | D93461       | REAL    | 7/30/98         | 30 GAL 2/3 FULL OF GREEN/YELLOW GRANULAR MATERIAL WITH SOME TURNINGS, SLIGHTLY DAMP, NO SPARKS, OVERPACKED INTO 55 GAL.   | 0                                       | 17.167           | 0             | 767.53           | 159710        | 1356.5          | 2050.6         | 99.136            | 354.91          | 170820       | 0.19                         | depleted                |
| 98A2105-179 | D93466       | REAL    | 8/3/98          | 30 GAL 2/3 FULL OF SLIGHTLY DAMP LOOSE COMPACTED GREENISH GRANULAR MATERIAL, DRUM CONSISTENT TOP TO BOTTOM, NO LIQUIDS PRESENT, NO SPARKS, OVERPACKED INTO 55 GAL.  | 0                                       | 19.554           | 0             | 1053.5           | 201670        | 1896.5          | 2608.2         | 92.683            | 413.97          | 205160       | 0.20                         | depleted                |
| 98A2105-181 | D93469       | REAL    | 8/3/98          | 30 GAL 80% FULL, TOP HALF OF DRUM LOOSELY COMPACTED, DAMP, GREENISH GRANULAR POWDER, BOTTOM HALF OF DRUM CONTAINED TIGHTLY COMPACTED MATERIAL THAT COULD NOT BE PENETRATED WITH THE WRECKING BAR, NO SPARKS, NO LIQUID, OVERPACKED INTO 55 GAL.               | 0                                       | 19.428           | 0             | 979.18           | 199600        | 1750.8          | 2778.6         | 101.94            | 395.48          | 204910       | 0.21                         | depleted                |
| 98A2105-182 | X10398       | REAL    | 8/3/98          | 55 GAL 80% FULL, TOP 6" COARSE TURNINGS, FEW SHINY METAL (STAINLESS?) INTERMIXED WITH DU TURNINGS, REST OF DRUM TIGHTLY COMPACTED POWDER AND GRANULAR MATERIAL, ALL DU GREENISH, NO WATER PRESENT, TURNINGS DID SPARK, OVERPACKED INTO 85 GAL.                | 0                                       | 22.682           | 0             | 1326.8           | 232770        | 2350.9          | 3817.7         | 109.95            | 459.885         | 249445       | 0.24                         | depleted                |
| 98A2105-183 | X10375       | REAL    | 8/4/98          | 30 GAL WITHOUT LID IN 55 GAL, ANNULAS BETWEEN 30/55 FILLED WITH FINE "GRAPHITE" POWDER (DARK GREY MATERIAL), 30 GAL FULL TO TOP, ONLY BOTTOM 6" OF GREEN GRANULAR DU MATERIAL, DU SLIGHTLY DAMP, NO SPARKS, SOME GRAPHITE IN SAMPLE, OVERPACKED INTO 85 GAL.  | 0                                       | 13.62            | 0             | 655.48           | 163600        | 1183.1          | 2232.1         | 60.626            | 289.07          | 156090       | 0.22                         | depleted                |
| 98A2105-184 | X09834       | REAL    | 8/5/98          | 8-12 SAMPLES COMPOSITED FROM TWO GRABS FROM 2 DRUMS IN B-12, SAMPLES GREEN AND YELLOW GRANULARS, SLIGHTLY MOIST AND COHESIVE, SEPARATED FROM CHUNKS, NO SPARKS.   | 0                                       | 14.367           | 0             | 695.96           | 147290        | 1218.8          | 1830.1         | 72.541            | 291.06          | 146800       | 0.19                         | depleted                |
| 98A2105-187 | X09829       | REAL    | 8/5/98          | 5 GAL PAIL W/ 3 JARS (~500ML) OF MATERIAL, SAMPLED FROM 2 JARS, GREY DARK MATERIAL, NO SPARKS, JARS WENT INTO A 1 GAL CAN AND PALCED IN THE WASTE DRUM, SAMPLE IN GAMMA SPEC HARD CORE/PLUG BROKEN W/ WRECKING BAR, SAMPLE IN VOAMP/CS SAME+OTHER. MAYBE UH3. | 0                                       | 15.66            | 0             | 904.55           | 232370        | 1765.7          | 9659.7         | 73.859            | 329.72          | 230280       | 0.65                         | natural                 |

T-1 Gamma Spectroscopy Data and Summary Information

| Sample #    | Inner Drum # | QC Type | Collection Date | Event Comment   | All gamma spectroscopy results in pCi/g |               |               |              |                |                           |                         |              |         |         | Calculated |          |
|-------------|--------------|---------|-----------------|---|---|---------------|---------------|--------------|----------------|---------------------------|-------------------------|--------------|---------|---------|------------|----------|
|             |              |         |                 |   | AC-228 Result                           | AM-241 Result | TH-234 Result | U-235 Result | PA-234M Result | Detection % (U-235/U-238) | Calculated U mass ratio | Uranium Type |         |         |            |          |
| 98A2105-189 | X09805       | REAL    | 8/17/98         | B-12 3/4 FULL OF SOIL, DUG TO BOTTOM IN 5 SPOTS, FOUND 1 DU CHIP. RAD SURVEYED MINIMAL RAD LEVELS, 5 LOCATIONS COMPOSITED. DU CHIP IN GAMMA SPEC BOTTLE, NO INERTING SOIL ADDED.  | 0                                       | 0.83089       | 0             | 0.73631      | 64.706         | 2.6204                    | 0.15759                 | 64.157       | 18.22   | 0.50    | natural    |          |
| 98A2105-190 | X09822       | REAL    | 8/17/98         | B-12 90% FULL OF SOIL, DUG 3 HOLES, BOTH ENDS AND MIDDLE OF BOX, SAMPLED FROM EDGE OF EACH HOLE FOR A TOTAL OF 8 LOCATIONS SAMPLED. MATERIAL COMPOSITED INCLUDED ABOUT 100 ML OF DU, DU SIZE REDUCED WITH SHOVEL, AND COMPOSITED WITH SOIL. | 0                                       | 2.5542        | 136.3         | 7.6043       | 6553.6         | 24.921                    | 131.2                   | 1.5536       | 6602.9  | 86.339  | 0.31       | depleted |
| 98A2105-191 | X09822       | DUP     | 8/17/98         | B-12 90% FULL OF SOIL, DUG 3 HOLES, BOTH ENDS AND MIDDLE OF BOX, SAMPLED FROM EDGE OF EACH HOLE FOR A TOTAL OF 8 LOCATIONS SAMPLED. MATERIAL COMPOSITED INCLUDED ABOUT 100 ML OF DU, DU SIZE REDUCED WITH SHOVEL, AND COMPOSITED WITH SOIL. | 0                                       | 2.6539        | 170.79        | 8.2137       | 7611.6         | 26.49                     | 147                     | 2.3372       | 7518.5  | 42.69   | 0.30       | depleted |
| 98A2105-192 | X09821       | REAL    | 8/18/98         | B-12 85% FULL, DUG HOLES AT BOTH ENDS, SAMPLED LARGER CHUNKS OF DU, CHUNKS PLACED IN PLASTIC BAG AND SIZE REDUCED WITH SLEDGE HAMMER. FINE MATERIAL WAS THEN PLACED IN SAMPLE JARS. DU WAS A COMBINATION OF YELLOW AND PALE GREEN.          | 0                                       | 22.459        | 0             | 226.78       | 147610         | 969.17                    | 2420.1                  | 67.855       | 140780  | 481.47  | 0.27       | depleted |
| 98A2105-194 | X09798       | REAL    | 8/18/98         | B-12 85% FULL, EXCAVATED AT BOTH ENDS AND MIDDLE, SAMPLED CHUNKS OF SUSPECTED DU INTO PLASTIC BAG AND SIZE REDUCED WITH SHOVEL AND TAMPING W/ SLEDGE. FINES PLACED INTO SAMPLE JARS. DU GENERALLY BLACK, SOME BRIGHTEST GREEN SEEN TO DATE. | 0                                       | 18.325        | 0             | 151.72       | 103690         | 656.14                    | 1880.9                  | 59.75        | 101130  | 745.56  | 0.29       | depleted |
| 98A2105-195 | X09801       | REAL    | 8/19/98         | B-12 EXCAVATED SOIL AND RCT SCREENED, SAMPLED FROM BOTH ENDS, COMPOSITED INTO PLASTIC BAG, THEN CHUNKS SIZE REDUCED BY TAMPING WITH SLEDGE. MATERIAL WAS DU YELLOW/GREEN AND SOIL.  | 0                                       | 16.113        | 0             | 116.99       | 85219          | 490.77                    | 1519.9                  | 31.123       | 85369   | 377.53  | 0.28       | depleted |
| 98A2105-196 | X09809       | REAL    | 8/19/98         | B-12 EXCAVATED 4 HOLES AT OPPOSITE ENDS OF B-12 AND LOCATED MATERIAL WITH HIGHER RADIATION LEVELS WITH RCT, CHUNKS SIZE REDUCED IN PLASTIC BAG, SAMPLED FROM BAG, MATERIAL RED/BROWN WITH SOME GREEN.                                       | 0                                       | 13.926        | 0             | 53.71        | 42450          | 251.45                    | 766.27                  | 19.206       | 42258   | 484.85  | 0.28       | depleted |
| 98A2105-197 | X09810       | REAL    | 8/19/98         | B-12 BIASED COMPOSITE FROM 4 CORNERS OF B-12, YELLOW/GREEN MATERIAL EASY TO VISUALLY IDENTIFY.  | 0                                       | 22.064        | 0             | 178.73       | 124020         | 795.45                    | 2050.5                  | 53.135       | 133030  | 482.72  | 0.24       | depleted |
| 98A2105-198 | X09800       | REAL    | 8/19/98         | B-12 BIASED SAMPLE FROM 4 CORNERS OF B-12, MATERIAL LOCATED VISUALLY AND BY RAD LEVELS, COMPOSITED AND SIZE REDUCED IN PLASTIC BAG, JARS FILLED FROM BAG, MATERIAL DARK GREEN WITH SOME YELLOW.   | 0                                       | 17.74         | 0             | 132.28       | 96108          | 581.8                     | 1585.2                  | 59.374       | 96197   | 381.41  | 0.26       | depleted |
| 98A2105-200 | X09799       | REAL    | 8/19/98         | B-12 BIASED COMPOSITE BASED ON VISUAL AND RAD LEVELS, MATERIAL DARK BROWN MIXED WITH SOIL.  | 0                                       | 8.68965       | 0             | 24.7205      | 14337          | 109.99                    | 270.495                 | 5.95775      | 14216   | 292.89  | 0.30       | depleted |
| 98A2105-201 | X09804       | REAL    | 8/19/98         | B-12 BIASED COMPOSITE FROM VISUAL AND WITH RAD LEVELS, MATERIAL BROWN/BLACK MIXED WITH SOIL.  | 0.60405                                 | 1.57815       | 0             | 6.9181       | 6000.35        | 25.7315                   | 101.254                 | 1.9399       | 5457.85 | 82.0945 | 0.29       | depleted |

T-1 Gamma Spectroscopy Data and Summary Information

| Sample #    | Inner Drum # | QC Type | Collection Date | Event Comment   | All gamma spectroscopy results in pCi/g |                     |                  |                     |                  |                    |                 |                      |                   |           | Calculated U mass ratio<br>%(U-235/U-238) | Calculated Uranium Type<br>DU/EU/Natural |
|-------------|--------------|---------|-----------------|---|---|---------------------|------------------|---------------------|------------------|--------------------|-----------------|----------------------|-------------------|-----------|---|--|
|             |              |         |                 |   | AC-228<br>Result                        | AM-241<br>Detection | AM-241<br>Result | TH-234<br>Detection | TH-234<br>Result | U-235<br>Detection | U-235<br>Result | PA-234M<br>Detection | PA-234M<br>Result | Detection |   |  |
| 98A2105-202 | X09803       | REAL    | 8/26/98         | B-12 1/2 FULL, EXCAVATED INSIDE B-12 LOCATED MATERIAL VISUALLY AND W/ RAD LEVELS. MATERIAL GREEN AND IN CLUMPS, COLLECTED INTO PLASTIC BAG AND SIZE REDUCED, NO SPARKS, FILLED B-12 TO CAPACITY W/ SOIL.                | 0                                       | 17.813              | 331.06           | 147.29              | 89923            | 524.31             | 1728.5          | 43.658               | 90586             | 696.96    | 0.30                                      | depleted                                 |
| 98A2105-203 | X09829       | REAL    | 9/1/98          | B-12 2/3 FULL SEARCHED FOR HISTORICAL GLASS SAMPLE JARS, LOCATED ONE ~4" BY 1.5" CYLINDER OF BLACK HARD MATERIAL, SIZE REDUCED IN PLASTIC BAG. MATERIAL MOST LIKELY CAME OUT OF SAMPLE JAR DURING EXCAVATION.           | 0                                       | 23.716              |                  |                     |                  |                    |                 |                      |                   |           | #DIV/0!                                   | #DIV/0!                                  |
| 98A2105-204 | X09829       | REAL    | 9/1/98          | CONTENTS OF D93470 (1/2 FULL 55 GAL) EMPTIED IN B-12 X09829, ONE INTACT OLD SAMPLE JAR ~30 ML FOUND, BOTTLE BROKEN INSIDE A PLASTIC BAG, THEN SAMPLED, ONLY A MARBLE SIZE AMOUNT OF BLACK MATERIAL PRESENT AND SAMPLED. | 0                                       | 35.276              | 0                | 109.03              | 326400           | 454.63             | 11131           | 33.223               | 329480            | 689.03    | 0.53                                      | natural                                  |
| 98A2105-207 | X09829       | REAL    | 9/2/98          | B-12 3" DIAMETER BY 2" HIGH CYLINDER WAS LOCATED VISUALLY AND WITH RAD, CYLINDER DARK GREEN WITH YELLOW HIGHLIGHTS, MATERIAL SIZE REDUCED IN PLASTIC BAG, THEN SAMPLED.   | 0                                       | 21.386              | 0                | 191.48              | 123640           | 881.46             | 4661.3          | 55.034               | 123580            | 491.1     | 0.59                                      | natural                                  |



Closeout Report for the Source Removal  
at the Trench 1 Site IHSS 108

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Appendix D-3  
T-1 Decanted Lathe Coolant Information

135

# T-1 Decanted Lathe Coolant

All liquids in 55-gal poly drums

| RIN-Event   | Location | Field OVA (gpm)   | Field Description   | All Rad in pCi/L |          |             | mass ratio |                           | Fingerprint parameters |             |              | All Chemicals in mg/l |  |         |         |        |                      |
|-------------|----------|-------------------|---|------------------|----------|-------------|------------|---------------------------|------------------------|-------------|--------------|-----------------------|--|---------|---------|--------|----------------------|
|             |          |                   |   | U-238            | U-235    | U-238/U-235 | AM-241     | 559 - g/L Pu              | pH                     | flash point | spec gravity | miscible w/           | Physical Description   | PCE     | TCE     | TICs   | Metals               |
| 98A2106-001 | X07938   | not taken         | single phase, light dark brown                                  | 1,510.00         | 75.00    | 0.72        | <68        | <16000                    | 8.5                    | NA-aqueous  | 0.9946       | water                 | single phase, non-viscous, transparent, colorless liquid   | 0.037   | 0.024   | 0.09 U | A few low detections |
| 98A2106-002 | X07927   | 115 PID           | single phase, dark brown, at bottom, half full drum             | 77,400.00        | 1,160.00 | 0.23        | <270       | 35200                     | 6.0                    | NA-aqueous  | 0.9963       | water                 | single phase, non-viscous, transparent, colorless liquid   | 0.25 UD | 0.25 UD | Fuel?  | A few low detections |
| 98A2106-003 | X07935   | 1500 FID, 350 PID | bottom phase, dark greenish-brown - 3.5" (sample layer) at 6.5" | 264,000.00       | 5,230.00 | 0.31        | <591       | Top=692000, Bottom=196000 | 5 - 6.5                | NA-aqueous  | about 1      | water                 | (6) layer: opaque, non-viscous, greenish liquid (3%); Bottom layer, transparent, non-viscous, colorless liquid (97%) | 0.7 J   | 1.3 U   | Fuel?  | A few low detections |
| 98A2106-004 | X07935   | 1500 FID, 350 PID | top phase, medium brown/ tan                                    | 125,000.00       | 1,510.00 | 0.19        | <391       | 56900                     | NA                     | 77.3 C      | 0.8106       | organics              | single phase, slightly viscous, transparent, light yellow liquid   | 2.400   | 1.3 U   | Fuel?  | A few low detections |

Best Available Copy

## Salomon, Hopi

---

**From:** Salomon, Hopi  
**Sent:** Wednesday, September 30, 1998 1:06 PM  
**To:** Sproles, Wayne; Estabrooks, Bates; Burmeister, Mark  
**Cc:** Henderson, Roger  
**Subject:** FW: 98A2106 Samples

It is probably safe to assume that the Pu results from the subject samples are in fact not contaminated with Pu. I say this with confidence because Pu was never identified in any significant concentration in the T-1 DU samples analyzed using radiochemical techniques at 559.

-----Original Message-----

**From:** Henderson, Roger  
**Sent:** Wednesday, September 30, 1998 10:39 AM  
**To:** Salomon, Hopi  
**Subject:** 98A2106 Samples

The group of samples under the APO ID number 98A2106 were analyzed using our methods normally utilized for 374 Liquid Waste Treatment Operations Samples. This generates g/l results and does not use a separation scheme that would separate Pu and U. Hence, elevated U levels in a sample can cause artificially high levels of Pu to be reported, as is most likely the case in these samples, which did show some <sup>235</sup>U levels above the method MDA.

I hope this clears any concerns regarding the reported results.

Roger.

Closeout Report for the Source Removal  
at the Trench 1 Site IHSS 108

Document Number.: RF/RMRS-99-302.UN  
Revision: 0  
Page: Appendices

Appendix D-4  
T-1 Cemented Cyanide Reclassification Letter



Rocky Mountain  
Remediation Services, L.L.C.  
... protecting the environment

## INTEROFFICE CORRESPONDENCE

DATE: November 5, 1998

TO: Bob Griffis, Trench 1 Project Manager, x4934, T893B  
Ted Hopkins, Manager Environmental Compliance, x7652, B116

FROM: Hopi Salomon, Trench 1 Project, x6627, T893B \$

SUBJECT: TRENCH 1 CEMENTED CYANIDE WASTESTREAM RECLASSIFICATION -  
HS-002-98

During the excavation phase of the Trench-1 (T-1) Source Removal project, ten 55-gallon drums of unsolidified cemented cyanide waste were exhumed from the trench. Several issues exist regarding the classification of this waste. This letter was prepared to summarize the existing analytical data, present the current waste classification and associated issues, and then present a case for modification of the current classification. Treatment standards resulting from new regulations that effect this waste will then be presented. If acceptable, concurrence to a modification of the waste classification will be granted by signing the concurrence line at the end of this letter.

### Summary of existing analytical information

Samples were collected from each of the ten drums for gamma spectroscopy and total cyanide analysis. All results indicate low level uranium contamination and significant levels of cyanide (0.51 - 5.3 weight %). Most of the drums appeared to contain asbestos fibers; two drums were sampled for asbestos analysis and both contained significant asbestos (15 and 25% by volume). Four samples were collected from three of the drums (this included one duplicate) and were analyzed for VOCs/SVOCs, the full TCLP list, reactive sulfide, reactive cyanide, corrosivity, and isotopic Pu, Am, U, as well as additional gamma spectroscopy. I believe that these four samples are representative of the entire wastestream. A summary of the analytical results follows:

No VOCs or SVOCs were detected

All samples exceeded TCLP thresholds for cadmium (829-1,200 mg/L)

No other TCLP thresholds were exceeded

pH was in the range of 12.4-13.2

Reactive Sulfide was undetected (though holding time was missed by a few days)

Reactive Cyanide: Three of four samples reported as undetected. One sample reported as 0.3 mg/kg reactive cyanide.

The original, complete data set collected to characterize this waste can be found in the K-H Analytical Services Division vault under report Identification Number (RIN) 98A2109.

#### Current Waste Classification

Currently, the cemented cyanide is classified as D006 for exceeding the TCLP threshold for cadmium. Since the waste is not an aqueous solution or liquid, the characteristic standard for corrosivity did not apply.

As far as issues regarding D003 codes for reactive cyanide or F-listing based on the original generation process, let me give you some information from the approved PAM (RF/RMRS-97-011, the project specific Decision Document). This comes from Section 5.2.2, Identification and Listing of Hazardous or TSCA (PCB) Wastes:

*The historical record indicates that 10 drums of cemented cyanide wastes were disposed in T-1. The cyanide wastes could have originated from either listed electroplating sources or non-listed heat treating activities conducted in building 444. Because of the uncertainty as to the source, any cyanide waste, soil/waste mixtures, debris or wastewater will be considered potentially reactive until tested and determined otherwise. (See 40 CFR § 261.23(a)(5)). Where appropriate, any cyanide waste, soil/waste mixtures, debris, or wastewater will be evaluated for other hazardous waste characteristics.*

As the PAM excerpt presented above indicates, applying an F-listed code to the waste was believed to be inappropriate because the exact generation process could not be identified (this will be discussed later in this paper). Proper characterization of the waste with respect to D003 (cyanide reactivity) was an unresolved waste characterization issue. As you are aware, EPA has recently withdrawn the Cyanide and Sulfide Reactivity Guidance (see RCRA Hotline Faxback 14177). This appears to be a result of concerns raised about the appropriateness of SW-846 test method used for evaluating reactive cyanide, and the fact that the waste being evaluated would not necessarily be subject to a range of pH conditions between 2 and 12.5.

EPA further states:

*Until revised guidance is developed, we (EPA) reiterate the RCRA regulatory language. That is, 40 CFR 261.23(a)(5) specifies that human health and the environment must not be endangered by evolved toxic gases when these wastes are exposed to pH conditions between 2 and 12.5. Any waste causing a hazard, when in the pH range of 2-12.5 would certainly be considered a characteristic hazardous waste.*

*We understand that withdrawal of the guidance today means that waste generators that have relied on this guidance in the past will, in the near term, have greater uncertainty about determining the regulatory status of their cyanide- and sulfide-bearing wastes. However, the Agency believes that generators of sulfide- and cyanide-bearing wastes can recognize the acute toxicity of sulfides and cyanides without relying on the test in the guidance. Where wastes with high concentrations of soluble sulfides and cyanides are being managed, generators have relied on their knowledge of the waste to classify them as D003. The Agency expects that generators should continue to classify their high*

*concentration sulfide- and cyanide-bearing wastes as hazardous based on the narrative standard.*

Based on the issues associated with the test method and EPA's recent statements I believe that we do not have the necessary information to make an informed decision on whether or not this wastestream should be characterized as reactive. However, this may be a moot point. Issues have surfaced regarding the initial characterization as non-listed. If the waste is determined to be listed, the same treatment standards required for reactive cyanide waste will be required based on the LDR requirements for the listing. The following section elaborates on this issue.

#### Proposed Modification to the Current Waste Classification

As noted in the PAM, the cyanide wastes could have originated from either listed electroplating sources or non-listed heat treatment operations conducted in building 444 (Note that some heat treatment operations involving cyanides are "listed" under RCRA (see waste descriptions for F010 - F012 wastes in 40 CFR 261.31)). The heat treatment source was identified during interviews conducted by T-1 personnel with past Building 444 personnel on January 23, 1997. Summary information from the interview state that cyanide salt was used in the Precision Shop for "carbonizing" (heat treat furnace). Section 4.4.7.2 of the Rocky Flats Historical Release Report (HRR), Building Histories document (November, 1994) discusses the heat treatment operations conducted in Building 444 but makes no mention of cyanide used in the process. However, cyanides are often associated with heat treatment operations as indicated by RCRA.

The HRR does however make reference to electroplating operations involving both cyanide and cadmium in Building 444. Prior to excavation and analytical testing the cyanide waste was not specifically known to be associated with cadmium. However, as the analytical results indicate, cadmium is a major part of the cemented cyanide wastestream. With the current information, it makes it difficult not to associate the cemented cyanide to a listed electroplating operation or listed heat treatment operation involving both cyanide and cadmium.

All of the associated "listed-waste" codes associated with electroplating or heat treatment operations have the same treatment standards except one, F010. The F010 code is described in 40 CFR 261.31 as "*Quenching bath residues from oil baths from metal heat treating operations where cyanides are used in the process.*". The treatment standards for F010 only includes standards for cyanide and not any metal constituents required by the F006-F009 treatment standards for electroplating and F011 and F012 for other heat treatment operations. As a result of the high cadmium concentrations, it is unlikely that the F010 code should apply. Another factor is that the HRR indicates that no radioactive materials were allowed in the heat treatment yet the cemented cyanides are radioactively contaminated. Furthermore, waste generated from electroplating operations involving cadmium would be expected to have higher cadmium concentrations than waste generated from heat treatment operations, indicating that it is more appropriate to code the waste with a F006-F009 than an F011 or F012 code.

Finally, it is impossible to ascertain which portion of the electroplating process (if not all) made up the waste exhumed during the T-1 excavation. It is more likely that the waste was associated with a sludge (F006) or residue (F008) which could have been drummed as opposed to an electroplating waste solution (F007, F009), as these would have typically been sent to the onsite water treatment facility when produced.

Finally, all electroplating waste codes that could be associated with the ten drums of cemented cyanides have identical treatment standards. However, to simplify the coding and since all the treatment standards are the same, the two most likely electroplating codes (those involving sludges and residues) have been chosen. These codes, are F006 and F008 and are defined as "Wastewater treatment sludges from electroplating operations...", and "Plating bath residues from the bottom of plating baths from electroplating operations where cyanides are used in the process", respectively. These should be considered the only hazardous waste codes associated with the cemented cyanides.

#### New Regulations Effecting Final Disposal

The new Phase IV LDR Regulations affecting land disposal of hazardous waste were promulgated by EPA on May 26, 1998 (63 FR 18556-28753). These regulations have not yet been adopted by Colorado, however they may impact final offsite disposal. To account for any potential disposal option, it is suggested that any future treatment contracts for the cemented cyanide wastestream require the most stringent treatment standards for F006 or F008 waste. This conservative strategy was also advocated by Andy Drom of Envirocare of Utah, Inc., in a recent telephone conversation with Robert Cygnarowicz and myself.

The following table lists the current Colorado treatment standards found in 6 CCR 1007-3, Section 268.40 and the Federal standards that will be incorporated into the next issuance of 40 CFR 268.40, as well as the proposed standards for our waste

#### **Treatment Standards for the T-1 Cemented Cyanide Waste**

| Waste Codes | Waste Descriptions   | Common Name         | Current Colorado Nonwastewater Treatment Standard | Phase IV LDR Nonwastewater Treatment Standard | Project Required Nonwastewater Treatment Standard |
|-------------|--|---------------------|---|---|---|
| F006        | Wastewater treatment sludges from electroplating operations... | Cadmium             | 0.19 mg/L TCLP                                    | 0.11 mg/L TCLP                                | 0.11 mg/L TCLP                                    |
|             |  | Chromium (Total)    | 0.86 mg/L TCLP                                    | 0.60 mg/L TCLP                                | 0.60 mg/L TCLP                                    |
|             |  | Cyanides (Total)    | 590 mg/Kg   | 590 mg/Kg                                     | 590 mg/Kg   |
| F008        | Plating bath residues from the bottom of plating baths...      | Cyanides (Amenable) | 30 mg/Kg  | 30 mg/Kg                                      | 30 mg/Kg  |
|             |  | Lead                | 0.37 mg/L TCLP                                    | 0.75 mg/L TCLP                                | 0.37 mg/L TCLP                                    |
|             |  | Nickel              | 5.0 mg/L TCLP                                     | 11 mg/L TCLP                                  | 5.0 mg/L TCLP                                     |
|             |  | Silver              | 0.30 mg/L TCLP                                    | 0.14 mg/L TCLP                                | 0.14 mg/L TCLP                                    |

The current analytical data indicates that only the TCLP cadmium and total cyanide concentration standards are currently exceeded. However, it should be noted that because of high levels of cadmium in the cemented cyanide, the samples required some dilution by the analytical laboratory, causing the detection levels for other metals to be elevated. As a result, some of the samples indicate non-detections for lead and silver, however at levels slightly above the proposed treatment standards. Following immobilization of the cadmium through treatment, this matrix interference problem described above should cease.



Conclusion

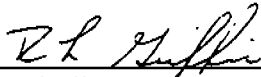
A strong case can be made to reclassify the ten drums of cemented cyanide waste as F006 and F008. Final treatment should accomplish two goals:

- 1) Immobilize the cadmium such that it will pass a 0.11 mg/L TCLP leach test for cadmium, and
- 2) Reduce the total cyanide concentration to below 590 mg/Kg.

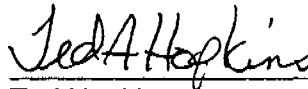
The final waste form must be such that the asbestos waste contained in the cemented cyanide matrix is not friable.

If you concur, with the reclassification of the wastestream as well as proposed treatment standards suggested please sign on the concurrence line below. If you have any question please call me at extension 6627.

Concurrence:



Bob Griffis  
Trench 1 Project Manager



Ted Hopkins  
Manager Environmental Compliance

HS/aw

cc:

Marla Broussard  
Mark Burmeister  
Lane Butler  
Robert Cygnarowicz  
Tom Greengard  
Ted Hopkins  
Julie Horton  
Mike Pepping  
Florence Phillips  
Jim Schoen  
John Law

Appendix E  
Post Excavation Geophysical Survey

**GEOPHYSICAL SURVEYS PERFORMED AT THE  
TRENCH 1 SITE OF THE  
ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE  
GOLDEN, COLORADO**

Blackhawk Geometrics Project Number 9914RMR

*Prepared For:*

**ROCKY MOUNTAIN REMEDIATION SERVICES, L.L.C.**

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January 26, 1999

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Appendix A – Equipment Specifications

## 1.0 INTRODUCTION

---

This report covers the procedures and results of geophysical surveys performed at the Trench 1 Site of the Rocky Flats Environmental Technology Site, Golden, Colorado. The fieldwork was done on January 21, 1999, by Blackhawk Geometrics, Inc. (Blackhawk) for Rocky Mountain Remediation Services, L.L.C., (RMRS).

The objective of the surveys was to identify buried metal objects within a six-foot swath surrounding the approximately 200 feet long and 15 feet wide Trench 1. This information would be used to evaluate the potential of additional buried hazardous material at the trench site. To meet the survey objectives, an electromagnetic metal detection survey utilizing the Geonics EM61 High Resolution Metal Detection System was carried out. An additional magnetic survey utilizing a Geometrics G-858 Cesium vapor magnetometer was also done at the site.

## 2.0 SURVEY PROCEDURES

---

The data for both the magnetometer and EM61 surveys were collected along survey lines spaced three feet apart and orientated parallel to the long axis (east-west) direction of the trench. A data point was collected every 0.6 feet along the survey line for the EM61 and every 0.2 feet for the magnetometer. This resulted in 100% coverage of the six-foot wide survey swath around Trench 1. The survey requirements were that a five-gallon metal drum at a depth of six feet be detectable. An object this size and at this depth should be near the limit of detectability for the EM61 and should be easily detectable with the magnetic data assuming no significant "noise." Descriptions of the EM-61 and magnetometer systems are contained in Appendix A.

The Trench 1 site is located within a tent structure supported with aluminum beams and tied down with ferrous metal rebar. The north wall of the structure is approximately 12 feet from the edge of the trench. The proximity of metal within the wall affected both EM and magnetic data collected on the north side of the trench.

The EM-61 data were collected with two coils. The lower coil, which is both a transmitter and receiver coil (See Appendix A), was located at a distance of 16 inches above the ground. The lower coil is primarily utilized to identify buried metal. The upper coil (receiving coil) is located 16 inches above the lower coil. The upper coil is utilized for depth estimates of buried objects.

The magnetometer data was collected with a single sensor positioned on a wheeled cart 20 inches above the ground surface. Total magnetic field data were recorded. Due to the short time it took to collect the data less than half an hour and relatively large anomalies (>50 gammas), no diurnal corrections were applied to the data.

The four corners of the survey grid were marked on the ground with plastic wiskers. The 0,0 and 0,30 points were labeled with paint on the ground. The grid was also tied to a control survey point located at grid point 6,12 and to the other cultural features within and adjacent to the survey area. The survey lines were marked with plastic measuring tapes, and the two instruments were run along the tapelines.

### 3.0 RESULTS

The EM61 lower coil and magnetometer data were gridded and color shaded utilizing the Geosoft™ geophysical processing software. These color contour maps are shown in Figures 3-1 and 3-2. Utilizing primarily the EM61 data, 13 individual anomalies were picked and three anomalous zones identified. The locations of these anomalies are shown in Figures 3-1 and 3-2 and are listed in Table 3-1.

**TABLE 3-1**  
**ANOMALY LOCATIONS**

| <u>Anomaly #</u> | <u>Center Location</u> |          | <u>Magnitude</u><br>(millivolts) | <u>Cause</u> | <u>Depth</u> |
|------------------|------------------------|----------|----------------------------------|--------------|--------------|
|                  | <u>X</u>               | <u>Y</u> |                                  |              |              |
| 1                | 6                      | 12       | 203                              | Survey Pin?  | 8 inches     |
| 2                | 6                      | 150      | 75                               | Unknown      | 20 inches    |
| 3                | 6                      | 183      | 10                               | Unknown      | 4 inches     |
| 4                | 6                      | 186      | 16                               | Unknown      | <10 inches   |
| 5                | 25                     | 162      | 21                               | Unknown      | -            |
| 6                | 24                     | 145      | 23                               | Unknown      | -            |
| 7                | 24                     | 143      | 24                               | Unknown      | -            |
| 8                | 24                     | 110      | 17                               | Unknown      | -            |
| 9                | 24                     | 102      | 16                               | Unknown      | -            |
| 10               | 24                     | 79       | 98                               | Buried Drum  | -            |
| 11               | 24                     | 57       | 128                              | Unknown      | -            |
| 12               | 24                     | 42       | 90                               | Unknown      | -            |
| 13               | 24                     | 14       | 53                               | Survey Pin ? | -            |

| <u>Zone</u> | <u>Extent</u> |            | <u>Range of Magnitude</u><br>(millivolts) |
|-------------|---------------|------------|---|
|             | <u>X</u>      | <u>Y</u>   |   |
| A           | 24 to 30      | 216 to 250 | 20 to 150                                 |
| B           | 24 to 30      | 157 to 175 | 10 to 24                                  |
| C           | 24 to 30      | 5 to 65    | 40 to 135                                 |

## 3.2 EM61 Data

The results of the EM61 survey are shown in Figure 3-1. The data shows significant differences from the north and south sides of the trench. This is likely the result of the proximity of the temporary structure metal supports, vents, and doors, which are located approximately six feet north of the survey grid. In addition, there appears to be a larger number of buried metal items on the north side of the trench area.

Along the south edge of Trench 1, the background EM61 readings range from 0 to 2 millivolts. Four buried metal objects are identified along this side of the trench and are labeled 1 through 4 on both Figure 3-1 and Table 3-1. Anomaly 1 is located at the Trench 1 survey control point. It is likely caused by a metal survey stake driven into the ground, although no stake was visible at the surface. Anomalies 2, 3, and 4 are relatively small in areal extent and are interpreted to be shallow (<20 inches).

Along the northern side of the trench, three zones are mapped which appear to contain numerous buried metal objects and/or have significant interference from metal within the building wall. These zones are labeled A, B, and C on Figure 3-1 and Table 3-1. In Zone A, a relatively wide area (20 feet) of anomalous readings is present near the northwest corner of the trench. Although there is some effect from the wall, the cause of the anomaly is unknown. Zone B shows moderate magnitude anomalies (15 to 20 millivolts). Zone C near the northeast portion of the trench contains multiple anomalies. There is a high density of aluminum wall supports in this area and a portion of the anomalies is caused by the supports. Several isolated anomalies are also present within the area. The size and type of buried metal in these areas cannot be determined.

A total of nine anomalies labeled 5 through 13 were identified in the data from the north side of the trench that may be the result of isolated metal objects. Anomaly 10 is caused by a known five-gallon size drum at a depth of approximately 2.5 feet. The magnitude and areal extent of this anomaly is a good general indicator of what would be expected from a similar sized object. Anomalies 5 through 9 are smaller both in magnitude and areal extent, than Anomaly 10. These anomalies are likely caused by metal objects significantly smaller than a five-gallon drum and should be shallower than 2.5 feet. Depths to the center of buried metal could not be modeled for items on the north side of the trench due to interferences from metal in the temporary structure. Anomalies 11 and 12 are generally similar to Anomaly 10 in both magnitude and areal extent. Although it cannot be determined what the metal object causing the anomaly is, it may be of similar size to a five-gallon drum. It is also possible that several smaller closely spaced metal objects are responsible for the anomalies.

Anomaly 13 is similar in shape although smaller in size than Anomaly 1. It is located adjacent to a surveyed point and may be caused by a smaller survey nail.



### 3.3 Magnetic Data

The data from the magnetic survey are shown in a color-contoured form in Figure 3-2. The magnetic data is much more difficult to interpret than the EM61 data for several reasons. These include:

- More complex anomaly shapes.
- Poorer lateral resolution.
- Presence of ferromagnetic material adjacent to survey area.

The magnetic data generally shows the same features as the EM61 data although individual anomalies are not as readily apparent. For this reason, anomaly selection was mainly done utilizing the EM61 data.

## 4.0 SUMMARY

---

The EM61 data was the most effective at mapping buried metal objects at the Trench 1 site. The magnetic data showed similar features but was less effective at resolving the location of individual objects. A total of 13 suspected individual objects and three zones of multiple objects were identified in the data. The location of these zones and individual objects are shown on Figures 3-1 and 3-2 and are listed in Table 3-1. In addition, areas where anomalies are caused by metal objects located adjacent to the survey area are shown with X's on Figures 3-1 and 3-2.

Anomaly 10 is caused by a buried five-gallon drum at a depth of approximately 2.5 feet. Its size and shape are what would be expected for anomalies from similar sized objects. Anomalies 2, 3, 4, 5, 6, 7, 8, and 9 appear to be caused by buried metal significantly smaller than a five-gallon drum and likely are buried at shallow depths. Depth estimates were made for objects on the south side of the trench but cannot be done for those on the north side due to interferences. Anomalies 11 and 12 are within Zone C. They are similar size and shape to Anomaly 10 and may be caused by a similar sized buried metal object. It is possible that these anomalies are caused by several closely spaced smaller objects. They are located in a zone which appears to contain numerous buried metal items.

Anomaly 1 is located at a survey point set by RMRS within the Trench 1 building. Anomaly 13 is located adjacent to a survey point. They are similar in size and shape to what would be expected from a vertical metal rod. Anomaly 13 is larger and may be from rebar while Anomaly 2 could be caused by nail.

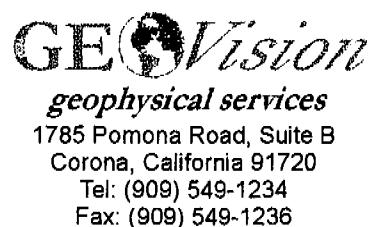
## 5.0 CONCLUSIONS AND RECOMMENDATIONS

---

The geophysical surveys were effective at mapping buried metal objects at the Trench 1 site. The EM61 data was primarily used to identify buried metal objects. The presence of metal within the housing structure affected data collected on the north side of the trench resulting in more complex anomalies in this area.

A total of 13 individual buried metal items were interpreted. Two of the anomalies are generally similar in size and shape to a known five-gallon drum buried at the site. Eight of the items are much smaller than the drum anomaly and are likely small metal items buried at shallow depths. Two other anomalies are likely caused by buried metal survey stakes.

Three zones of multiple buried metal objects were identified. Zone A is near the northwest edge of the trench and based on depth to the caliche zone only a couple feet of fill may be present. Zone B has lower magnitude EM61 anomalies and likely caused by small metal objects. Zone C is the most complex area and contains two identified individual anomalies similar in size to the known drum anomaly. Due to the complex anomalies in this area, other buried objects of similar size to the drum may be present but not separately observed in the data. This area of the survey site has the highest potential for additional buried drums and should be investigated accordingly.



## **Geophysical Surveys for Buried Waste Site Assessments**

### **Introduction**

Surface geophysical surveys, when properly planned, executed, and interpreted can significantly reduce intrusive testing and costly analytical work. It can set the framework for selecting drill hole and sampling locations, and can be used to extrapolate results to areas beyond the immediate drill hole or trench. This technical note is a brief overview of available technology at a point in time when, particularly in data display and processing, great strides are being made.

Geophysical methods commonly employed in surveys for buried waste are listed in Table 1 on pages 2 and 3 of this Technical Note. Although these various geophysical methods differ in many respects, all effective geophysical programs need to address the following factors:

*The generation of sound geological and site history models based on available information.*

Such models are used to guide the selection of geophysical techniques and survey parameters. The successful application of particular methods can be highly site specific. The attainable data quality can often be anticipated from a knowledge of site conditions and models based on preliminary data from the area.

*The use of multiple geophysical techniques.*

The use of multiple techniques allows different objectives to be addressed and different depth ranges to be explored. Moreover, confidence in inferring geological features or the locations of contaminant sources from geophysical data is enhanced when the interpretation is supported by more than one technique.

*Infield (real time) data interpretation.*

Infield data interpretation allows adjusting survey parameters and changing geophysical methods to achieve objectives. Real-time interpretations require data acquisition in solid state memory loggers for transfer to personal computers, versatile software for data analysis, and personnel experienced with the full range of geophysical methodologies.

*Effective display of data.*

Presence of buried waste is inferred from anomalous values of geophysical measurements differing from those of background. Background values can also change due to a number of natural causes, such as variation in soil types, depth of overburden, and elevation differences. The recognition of background trends and the ability to differentiate between background and anomalous features due to buried waste is facilitated by optimum display formats.

*An integrated approach to interpretation.*

Geophysical interpretations clearly must be consistent with all available geologic and drilling data. Proof of specific features must exist both in geophysical interpretations and in geologic mapping, sampling or drilling. If the inferences drawn from geophysical data can be verified by intrusive testing at selected locations, then this verification can subsequently be extrapolated over larger areas.

## MAGNETIC SURVEYS

### Principles of Operation

The signals measured in a magnetic survey are partially the result of and strongly influenced by the ambient magnetic field of the Earth. The Earth's magnetic field resembles that of a single axis dipole with a south magnetic pole directed towards the geographic north pole. The strength of the Earth's magnetic field is about 60,000 gammas near the poles where it is directed vertically into the Earth, and about 25,000 gammas near the equator where it is parallel to the Earth.

Buried ferromagnetic objects cause local perturbations in the Earth's magnetic field (Fig. 1). The Earth's magnetic field induces a magnetic moment per unit volume in ferromagnetic material, and this induced magnetization is parallel with and proportional to the local Earth's magnetic field. Therefore, the intensity and shape of perturbations caused by a buried drum varies with the latitude across the Earth (Fig. 2). The total magnetic field measured is the vector sum of the ambient Earth's magnetic field, plus local perturbations caused by buried objects.

Magnetic field measurements are typically made with proton precession magnetometers (Fig. 3), and both total magnetic field and the vertical gradient of the magnetic field can be measured simultaneously.

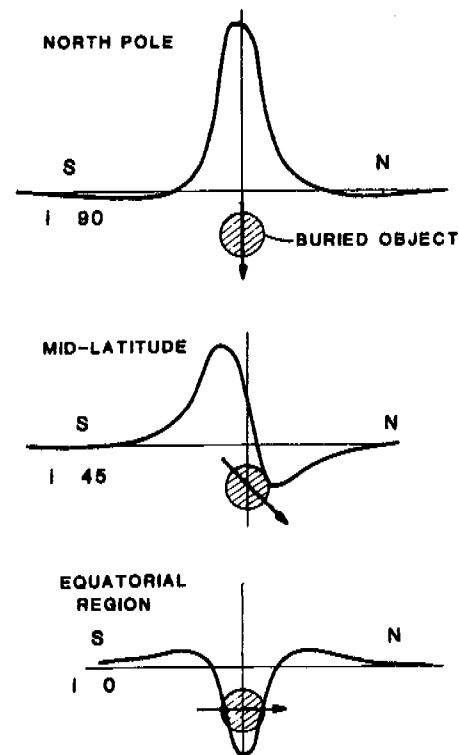


Figure 2 Shape of local perturbations (anomalies) in total magnetic field change with latitude.

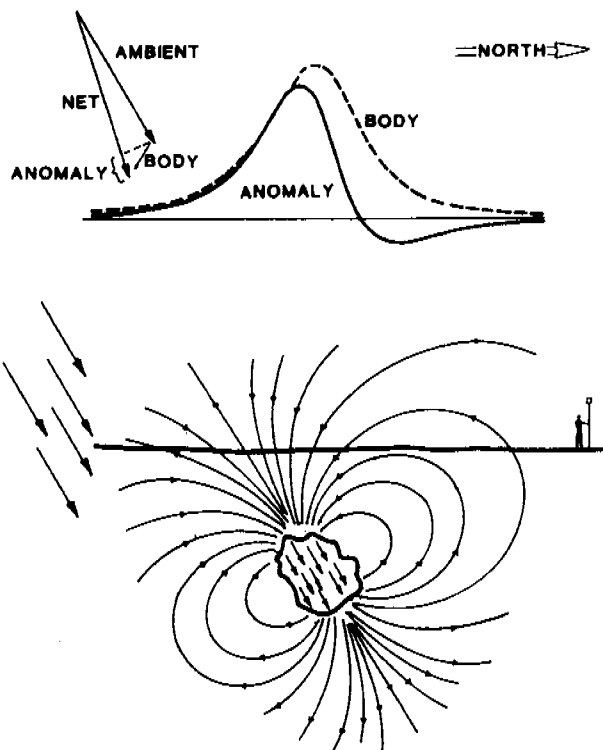


Figure 1 The earth's magnetic field induces a magnetic moment per unit volume in buried ferromagnetic debris (bottom). This causes a local perturbation (anomaly) in total magnetic field (top).



Figure 3 Proton Precession Magnetometer

**Table 1. Summary of Common Geophysical Methodologies in Site Assessment**

| Geophysical Methodology                | Physical Property Measured  | Applications and Limitations  |
|--|---|---|
| <i>Magnetic Surveys</i>                | <ul style="list-style-type: none"> <li>• Total Magnetic Field</li> <li>• Vertical gradient of magnetic field</li> </ul>             | <ul style="list-style-type: none"> <li>• Detection of ferromagnetic debris, drums, UST's, landfill boundaries, uncontrolled waste pits and trenches</li> <li>• Limited applications within areas with extensive infrastructures and surface debris</li> </ul>                         |
| <i>Frequency Domain EM Profiling</i>   | <ul style="list-style-type: none"> <li>• Ground conductivity</li> <li>• Anomalies in EM field caused by metallic objects</li> </ul> | <ul style="list-style-type: none"> <li>• Detection and delineation of waste pits, trenches, and landfill boundaries</li> <li>• Contaminant plumes dissolved in ground water</li> <li>• Limited applications within areas with extensive infrastructures and surface debris</li> </ul> |
| <i>Time Domain EM Object Detector</i>  | <ul style="list-style-type: none"> <li>• Anomalies in transient EM fields</li> </ul>  | <ul style="list-style-type: none"> <li>• Detection of electrical conductive buried objects, pipes, waste pits and trenches, landfill boundaries, cells within landfills</li> <li>• Interferences by infrastructure substantially mitigated</li> </ul>                                 |
| <i>Ground Penetrating Radar (GPR)</i>  | <ul style="list-style-type: none"> <li>• Two-way travel time to reflections caused by changes in dielectric constants</li> </ul>    | <ul style="list-style-type: none"> <li>• Detection of buried waste, waste trenches and pits, and voids</li> <li>• Can often be employed in areas with extensive infrastructures</li> <li>• Search depth highly site specific</li> </ul>   |
| <i>Metal Detectors/ Pipe Detectors</i> | <ul style="list-style-type: none"> <li>• Distortions in EM fields</li> </ul>  | <ul style="list-style-type: none"> <li>• Detection of metallic objects and pipes</li> <li>• Limited search depth</li> </ul>   |

### Practical Aspects of Operation

#### (1) Correction for Drift

The Earth's magnetic field generally drifts slowly over time (typically a few gammas per hour), but it can also have large diurnal variations (Fig. 4). In fact, during geomagnetic storms these variations can be so large as to preclude meaningful magnetic field measurements. Usually, diurnal variations can be dealt with in environmental surveys in a number of ways, such as

- Magnetic field perturbations caused by isolated drums or underground storage tanks (UST'S) have small spatial wavelength (10 ft. to 20 ft.), and measurements over such distances take minutes. Thus, spatially "tight" perturbations caused by drums can be readily recognized in the presence of normal drift.
- For larger areas (e.g., landfills) a base station is reoccupied with a roving magnetometer at regular intervals, and data are corrected for the drift observed over time at the base location, or
- A base station magnetometer is set out, that continuously records the Earth's magnetic field.

#### (2) Selection of Survey Parameters

The selection of survey parameters must be adapted to the mapping objective, and the spatial dimensions of the anomaly anticipated. These dimensions depend on depth of burial and sizes of buried objects searched for. For a single drum buried 3 ft. below the surface, the spatial dimension of the anomaly typically is less than 20 ft. Therefore, a survey directed to detect a single drum should use a grid spacing of not more than 10 ft., and preferably 5 ft. It can perhaps be larger in searching for UST's or multiple drums buried together.

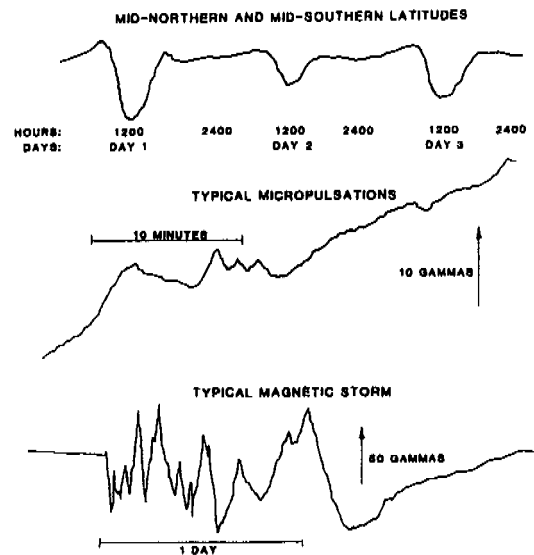


Figure 4 Variations in Earth's magnetic field over time

## Applications and Limitations

*Magnetic surveys have their main application in site assessment for:*

- Locating buried drums, UST's and pipes,
- Delineating pits and trenches with ferromagnetic metals,
- Delineating boundaries of landfills with ferromagnetic debris.

*Some limitations of magnetic surveys are:*

- Power lines interfere with measurements,
- In areas with extensive metallic debris scattered over the surface no distinction can be made between surface debris and buried debris,
- Metallic structures, such as buildings, fences, and reinforcement rods in concrete interfere with measurements.

## ELECTROMAGNETIC INDUCTION PROFILING Principles of Operation

In electromagnetic (EM) induction profiling the conductivity of the subsurface is measured. When debris is buried, conductivity generally changes for two reasons:

- (1) Buried debris has different conductivities than native soils. Conductivities can be either lower (e.g., construction debris) or higher (e.g., sludges, metallics).
- (2) The disturbance of native soils caused by excavation changes conductivity.

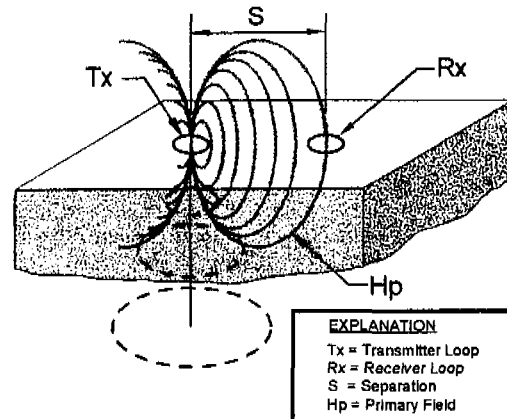
An EM system consists of a transmitter (Tx) and a receiver (Rx). Through the transmitter a sinusoidal current waveform is driven, and the primary EM field of the transmitter causes eddy current flow in the subsurface (Fig. 5). The intensity of these eddy currents is a function of ground conductivity. The eddy currents in turn cause a time-varying secondary EM field that is measured as a voltage in the receiver

In the two most common instruments employed in site assessment (Geonics EM-31 and EM-34), frequency of operation and spacing have been selected so as to make search depth relatively independent of ground conductivity, and the instrument meter provides a direct readout in apparent conductivity.

The secondary magnetic field caused by eddy current flow in the ground has an in-phase and quadrature phase (90° out-of-phase) component with the current waveform driven through the transmitter, and both components are small over ground with conductivities less than 1 00 millimhos/m (typically less than 1 part in 104 parts), and only the quadrature phase component can be measured to such accuracies

Over metallic objects, which have extremely high conductivities, both quadrature and in-phase components can reach tens of percent of the primary field.

### PRIMARY MAGNETIC FIELD



### SECONDARY MAGNETIC FIELD

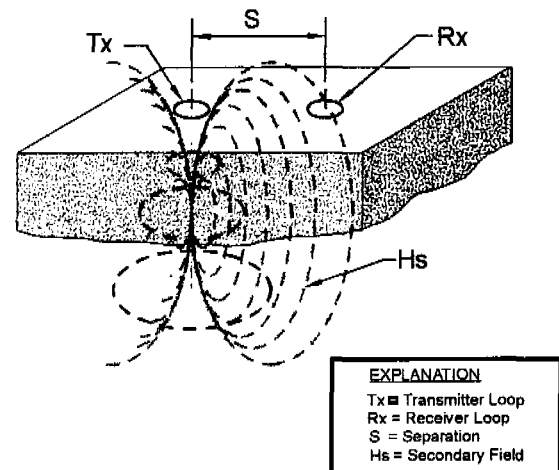


Figure 5 Schematic illustration of eddy currents in subsurface caused by primary magnetic field of Tx.



Figure 6 Geonics EM-31. Effective search depth between 10 ft. And 15 ft.



Figure 7 Geonics EM-34. Effective search depth depends on Tx-Rx separations and Coil orientation

Measuring both quadrature phase and in-phase component with the EM-31 (Fig. 6) allows differentiation between waste with (e.g., municipal fill) and without (e.g., sludges) metallic debris.

With the EM-34 (Fig. 7) only the quadrature phase component (ground conductivity) can be recorded, because the in-phase component is used for electronically measuring coil separation.

## Applications and Limitations

*EM surveys have their main application in site assessment for:*

- Searching areas for uncontrolled waste pits and trenches of unknown location,
- Determining boundaries of landfills, sludge lagoons, and other burial sites,
- Determining leachate plumes emanating from buried contaminants,
- Locating buried drums, UST's and other metallic buried objects.

*Some of the limitations of EM surveys are:*

- Metallic structures, such as buildings, buried utilities, metal fences and reinforcements in concrete interfere with measurements;
- In areas with extensive metallic debris scattered over the surface, no distinction can be made between surface debris and buried debris.

## TIME DOMAIN EM BURIED OBJECT DETECTOR (Geonics EM-61) Principles of Operation

The principles of operation of a time domain EM (TDEM) buried object detector are similar to that of frequency domain systems (Geonics EM-31 and EM-34). A major difference is in the system waveforms used (Fig. 8). In the EM-61 TDEM system, a half-duty cycle waveform is used, and measurements are made during the time the transmitter is off. This difference has a major impact on reducing noise and improving signal due to buried objects.

A photograph of the EM-61 is shown in Figure 9. The system consists of one transmitter and two receiver coils. The bottom coil is a transmitter during current on-time, and a receiver during off-time. The top coil, mounted 40 cm above the bottom coil, is a receiver only. The transmitter and receiver electronics controls are mounted in a backpack. The data logger, connected to the electronics, is hand-held.

Briefly, the rationale for employing time domain systems are:

- (1) In a frequency domain system (Fig. 6 & 7) the voltage measured at the receiver is the sum of voltages due to the electromagnetic field of eddy currents flowing in the subsurface (useful signal), and the primary magnetic field due to currents driven through the transmitter and coupled to the receiver through the air. This latter component contains no useful information about the subsurface. Yet, this voltage is often several orders of magnitude larger than the secondary magnetic field due to currents induced in the subsurface. All frequency domain systems, therefore, have the disadvantage of measuring a small useful signal (due to ground eddy currents) in the presence of a large signal (primary field) containing no information about the subsurface.
- (2) The voltage measured in the receiver due to eddy currents induced in the subsurface will have two contributions: (i) due to currents induced in surrounding soils (V.), and (ii) due to currents in buried objects (V.). For buried waste detection, the goal is to maximize the ratio  $V_o/V_s$ . It has been shown that currents in surrounding soils decay faster than currents in conductive (e.g., metal) objects, so that there will be a time range over which  $V_o$  is maximum. Use is made of this fact in the design of the EM-61 by recording the voltage in a time gate where  $V_o/V_s$  is expected to be maximum, and currents in surrounding soils have largely dissipated.

Field experiences have shown that the theoretical advantages of TDEM systems are realized in the EM-61 in practice. Some of these advantages are:

- (1) The signal due to buried targets is enhanced and background signal due to surrounding soils is low. Performance is near independent of soil type.
- (2) Lateral resolution of measurements is better than for frequency domain systems, and the radius of interference by above ground metallic objects (fences, buildings, power lines, etc.) is reduced.
- (3) The anomalies of buried objects is of simple shape, facilitating identifying and positioning buried objects



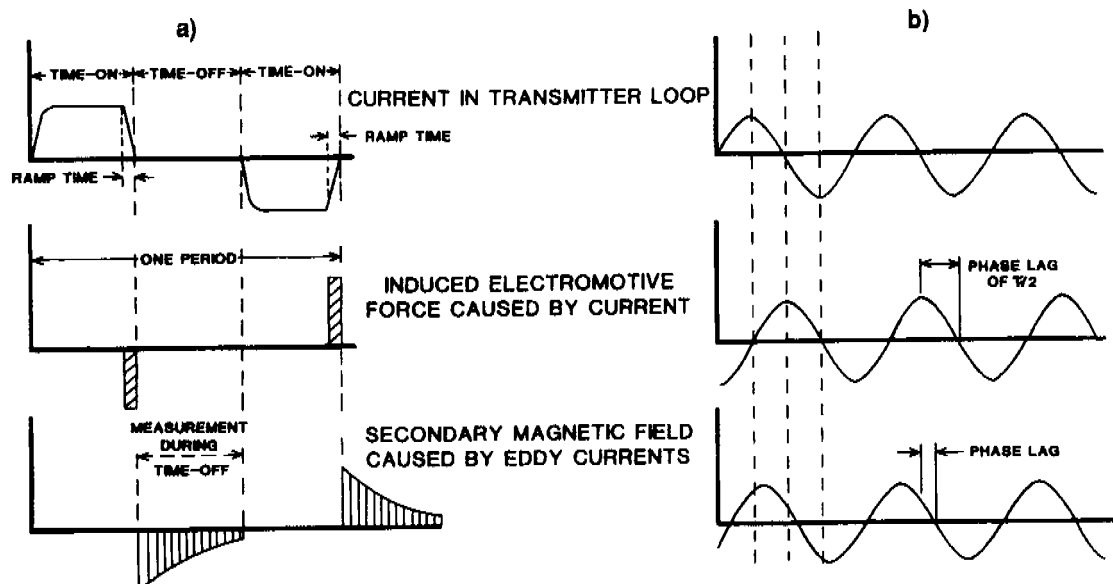


Figure 8 System waveforms used in time domain a) and frequency domain b) systems

## Applications

*The Geonics TDEM EM-61 buried object detector will have its main application for:*

- Locating buried drums, UST'S, and other metallic buried objects,
- Searching areas for uncontrolled waste pits and trenches

## GROUND PENETRATING RADAR Principles of Operation

Ground penetrating Radar (GPR) is based on the same principles as aircraft and shipboard radar. Short duration EM pulses of high frequency (80 megahertz to 1,000 megahertz) generated by a transmitting antenna propagate into the ground and are reflected from discontinuities in the subsurface back to a receiving antenna (Fig. 10). The same antenna can be used for transmitting and receiving (monostatic) or separate antennae can be employed (bistatic).

*There are two major differences between aircraft and shipboard radar and GPR:*

- (1) In aircraft and shipboard radar the main objects reflecting radar signals are large metallic objects (other ships and aircraft) or land masses. In GPR reflections can be caused by boulders, changes in water content, changes in density, voids, buried objects, and etc.
- (2) Aircraft and shipboard radar signals propagate through media with relative low attenuation (air); in GPR, attenuation in the subsurface can be very large because the ground has a finite electrical conductivity.

In GPR the velocity of propagation in the ground is determined by the dielectric constant, and the attenuation mainly by ground conductivity and scattering. The dielectric constant of ground is largely determined by water content, because the relative dielectric constant of water is 80, and that of rock and soil minerals typically is between 3 and 6. Velocity of propagation may change by about a factor 3, depending on water content. Attenuation is related to ground conductivity and is mainly a function of clay content and dissolved solids in ground water. Small percentages of clay can rapidly increase attenuation of GPR signals, and limit its effective search depth.

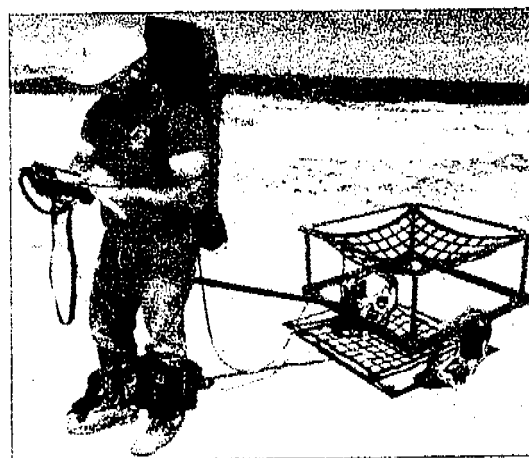


Figure 9 Photograph of EM-61 and operator

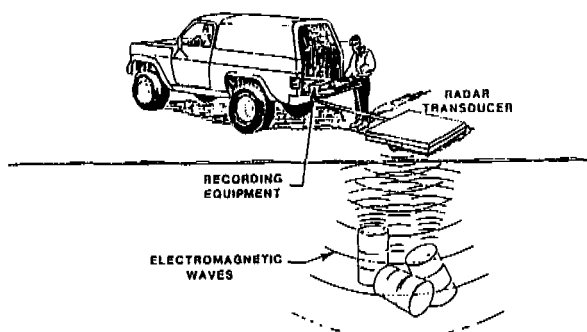


Figure 10 Schematic survey layout for GPR system

### Practical Aspects of Operations

GPR surveys are performed by pulling the antenna over the ground surface to generate a GPR profile. A typical profile is shown in Figure 11 where the horizontal axis is distance along the profile, and the vertical axis is two-way travel time from the antenna to a reflector in the subsurface.

The survey productivity is highly dependent on access. It is high with vehicle access and lower for foot access. In brush, GPR surveys require a wider and smoother path and more thorough clearing than EM or Mag surveys.

### Applications and Limitations

Thus, GPR signals are reflected from discontinuities in dielectric constant in the subsurface. Typical reflecting boundaries can be:

- Buried waste, drums, UST's, and pipes,
- Trenches and pits cause local disturbances in soil, layering, and even if buried objects in such trenches are not seen, the trench and pit walls can often be recognized on radar records by disruption of native soil layers,
- Voids and old mine workings.

*The advantages of GPR is its high resolution but limitations include:*

- Effective search depth is highly site specific and difficult to predict. For example a clay cap 2 ft. to 3 ft. thick over a landfill may screen GPR from penetrating below the fill. In clay or saline soils, drums or UST's buried 2 ft. to 3 ft. down may not be detectable.

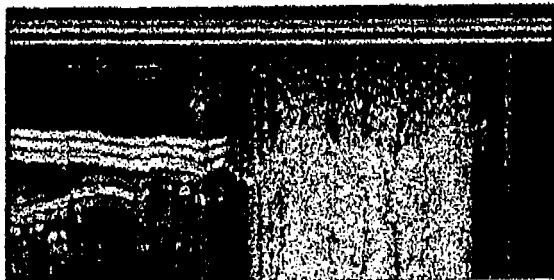


Figure 11 Typical GPR record over trench

## METAL DETECTORS AND UTILITY LOCATORS

### Principles of Operation

There are many different types of metal and utility locators, but all are designed to detect metallic objects. The operation of these instruments is based on one of the two principles given below:

- Sensing changes in the gradient of the magnetic field caused by local perturbations due to ferromagnetic objects (Fig. 12),
- Sensing the secondary EM fields due to a cable or metallic pipes (Fig. 13).

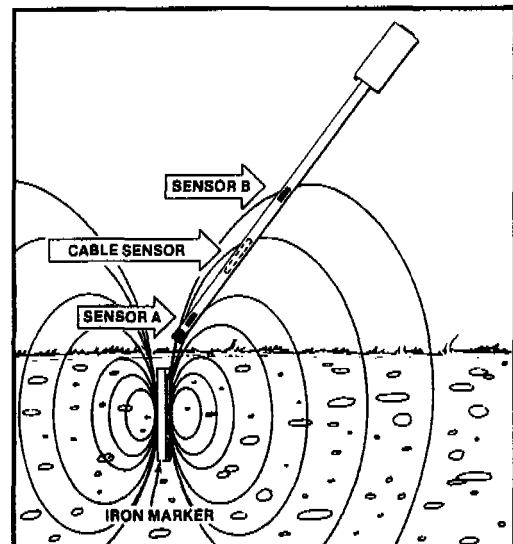


Figure 12 Schematic of principle of operation of metal detector using gradient in magnetic field.

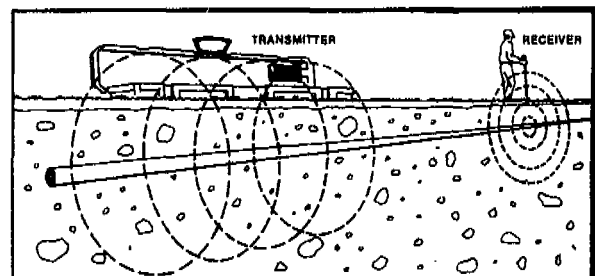


Figure 13 Schematic of principles of operation of pipe locator using anomalies in EM field caused by current flow induced in pipe.

## Practical Aspects of Operation

The output from these detectors typically is an audio signal varying in frequency or volume across a target. Therefore, contour maps of profiles for further processing and display are not produced. Survey procedures generally consist of defining the boundaries of the area to be surveyed, and then "sweeping" it with a detector. Because the response of the targets is not recorded, these targets are marked or staked during the survey.

## Applications and Limitations

*Metal detectors and utility locators have their main application in site assessment for:*

Sweeping small areas for buried metallic objects, such as

- Screening selected drilling or other intrusive sampling locations,
- Detecting UST's and underground utilities at gas stations,
- Locating utility lines,
- Locating critical metallic objects of limited dimensions buried within one foot from the surface (e.g., ordnance).

*Limitations are:*

- They are strictly anomaly detectors and are not suited for providing quantitative information,
- They have limited exploration depth.

## CASE HISTORIES

### White Sands Missile Range, New Mexico

The requirements for site assessment on the White Sands Missile Range are typical of those encountered on other military and DOE facilities throughout the U.S. Common characteristics of site assessment at such facilities are:

- (1) They have generally been in operation since the 1940's and burial of various types of material occurred in many uncontrolled pits and trenches. Their location is at best only approximately known, generally covered by fill and overgrown.
- (2) Disposal in landfills was not monitored, so that "hot spots" occur where sludges and other liquid wastes may have been disposed.
- (3) Sources of contamination may exist in areas used for fire training, burn pits and maintenance.

*An effective surface geophysical approach as part of an overall site investigation may consist of:*

- Surveys with a magnetometer along a surveyed grid. The line and station spacing generally depends on objective and details of prior information;
- Surveys with EM equipment along the same grid;
- Confirmation surveys with GPR if sufficient penetration depth is anticipated.

The case history below illustrates a typical survey. The objective of this survey was to map the lateral boundaries of a landfill abandoned in the 1960's.

Figure 14 shows the results of stacked profile plots of EM surveys with the Geonics EM-31. Measurements were made along lines spaced at intervals of 50 ft. and with 10 ft. station intervals along the lines. These survey parameters were selected because the approximate landfill boundaries were known, and the main objective was to determine the edges of the landfill. A line spacing of 50 ft. was sufficient to interpolate boundaries between lines. However, to map edges effectively, a 10 ft. station interval was selected along the lines.

An increase in apparent conductivity occurs along each profile from background onto the landfill, and the edges of the landfill are readily determined. Isolated anomalies are also observed outside the landfill boundary.

The survey outlined on Figure 14 was completed in 1 1/2 days of field work, and a framework for further investigation was established quickly. Stacked profile plots appear to be an optimum mode for data display here.

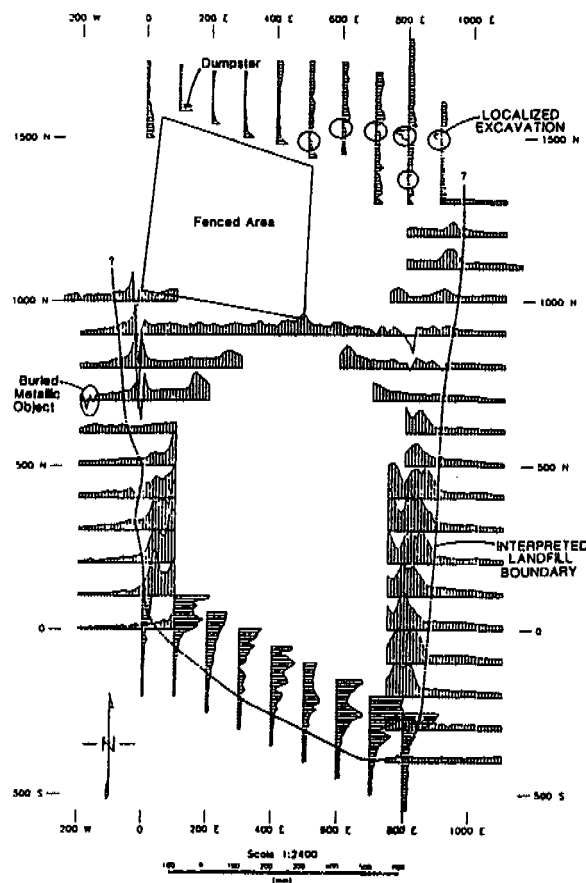


Figure 14 Stacked EM-31 apparent conductivity plots to locate landfill boundaries

## Idaho National Engineering Laboratory (INEL)

At INEL a trench has been constructed for the purpose of testing, detection and characterization of buried wastes by geophysical methods, and various retrieval technologies. Different objects, such as drums, wooden crates, and plastic vessels have been placed in the trench. Over this trench, data were acquired with a number of sensors, such as a EM-31, a proton precision magnetometer, EM-61 (time domain metal detector) and GPR. Measurements were made on a 2.5 ft. Grid. Results obtained with the EM-61 are given in Figure 15 in contour form and in Figure 16 as a 3-D perspective plot.

In evaluating the results of different sensors, the EM-61 proved most successful because of its low background noise, allowing good delineation of trench boundaries and berms between burial cells. Also, it had a high resolution for delineating individual objects within the trench.

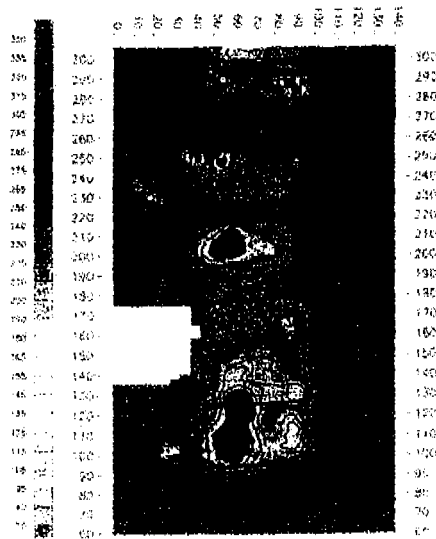


Figure 15 Color EM-61 Contour Map

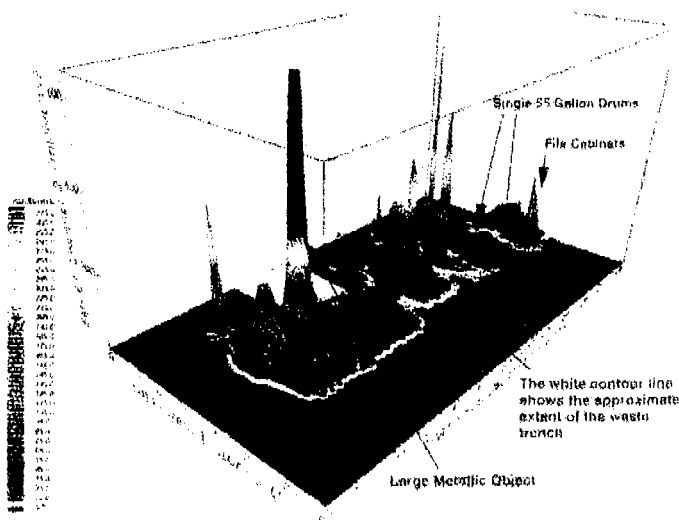


Figure 16 EM-61 3-D Perspective Plot

## Case History of Ground Penetrating Radar (GPR)

The case histories of the White Sands Missile Range and INEL have in common that a relatively large area (several acres to 100 acres) must be covered over terrain that may contain arroyos, rocks and boulders, and vegetation of various types. The portability of EM and Mag equipment make various types of surveys well suited over such terrain. GPR equipment is less suited for surveys over all types of terrain, and in these situations GPR surveys are best used as confirmation surveys over selected line segments. There are, however, a large number of applications in site assessment ideally suited for GPR as a primary tool, such as:

- (1) Surveys in highly built-up areas, e.g., Within Naval Shipyards, refineries, and chemical plants, where interferences by the infrastructure prohibits effective use of EM and Mag.
- (2) Surveys over small areas with good surface access (e.g., gas stations, roads, paved areas).
- (3) Surveys for objectives with limited or no EM or Mag signatures, e.g., Underground voids, abandoned mine workings.

### Example

Voids in the ground can be difficult to detect by EM, resistivity, seismic, gravity or magnetic surveys. Detection with these methods is strongly dependent on their depth of occurrence and size of the cavity. If the depth to the top of the cavity is shallow, and the ground is relatively resistive, GPR surveys can detect cavities. An example of a GPR survey for detecting abandoned mine workings is shown in Figure 17. In this area soil cover over limestone bedrock was relatively thin.

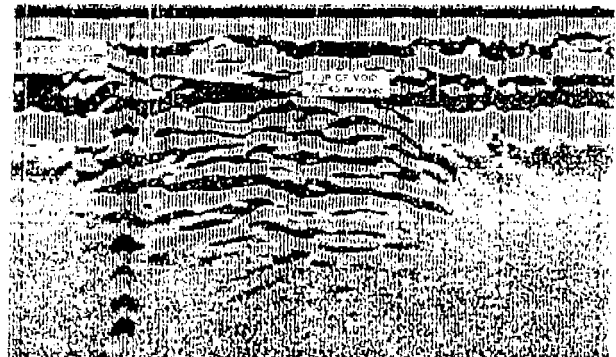


Figure 17 GPR record over an old mine working

164/164



Figure 4-1  
Trench 1

Excavation Verification  
and  
Sample Locations

EXPLANATION

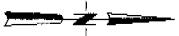
- Location of 5-gal Container
- Excavation Boundary
- Approx. Trench Grid Location
- Tent Location
- Sample Location
- Sample + Duplicate

EB0201 = Sample Location  
052 = Abreviated Sample Number  
Representing 98A211-052  
GS = Gamma Spectroscopy Analysis  
V = Volatile Organic Compound Analysis  
CN = Cyanide Analysis  
P = PCBs  
W = Western Third of 20' Sample Cell  
C = Center Third of 20' Sample Cell  
E = Eastern Third of 20' Sample Cell

Standard Map Features

- Fences and other barriers
- Paved roads
- Dirt roads

DATA SOURCE:  
Gridlines, fences, hydrography, roads and other  
structures from 1994 aerial flyover data  
captured by EG&G RSL, Las Vegas.  
Digitized from the orthophotograph, 1995  
MSS K08 boundary based on survey of fence post  
locations



Scale = 1 : 240  
1 inch represents 20 feet



State Plane Coordinate Projection  
Colorado Central Zone  
Datum: NAD27

U.S. Department of Energy  
Rocky Flats Environmental Technology Site

Prepared  
by:



Rocky Mountain  
Remediation Services, L.L.C.  
Geographic Information Systems Group  
P.O. Box 464  
Golden, CO 80602-0464

MAP ID: 99-0000

June 29, 1999

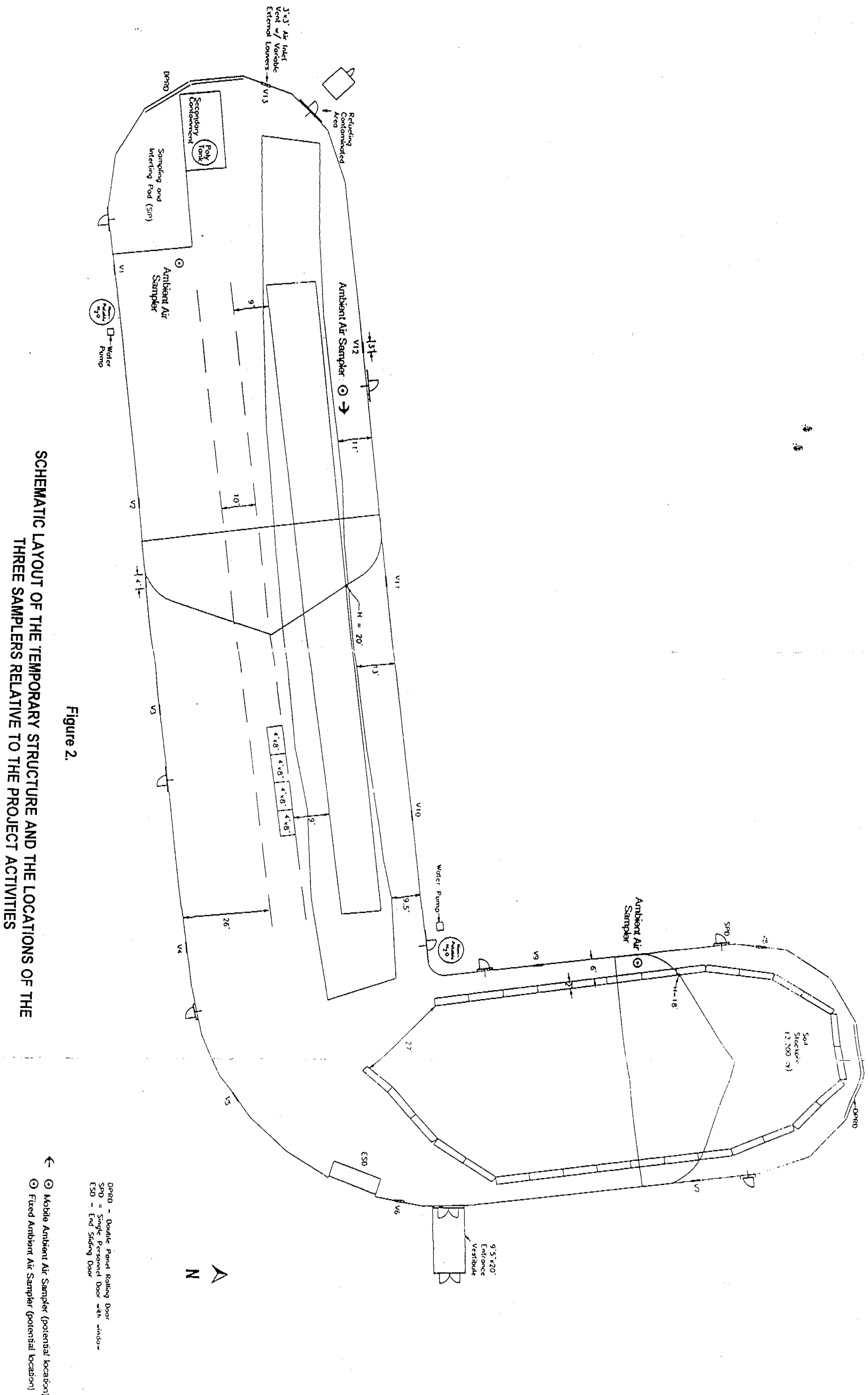
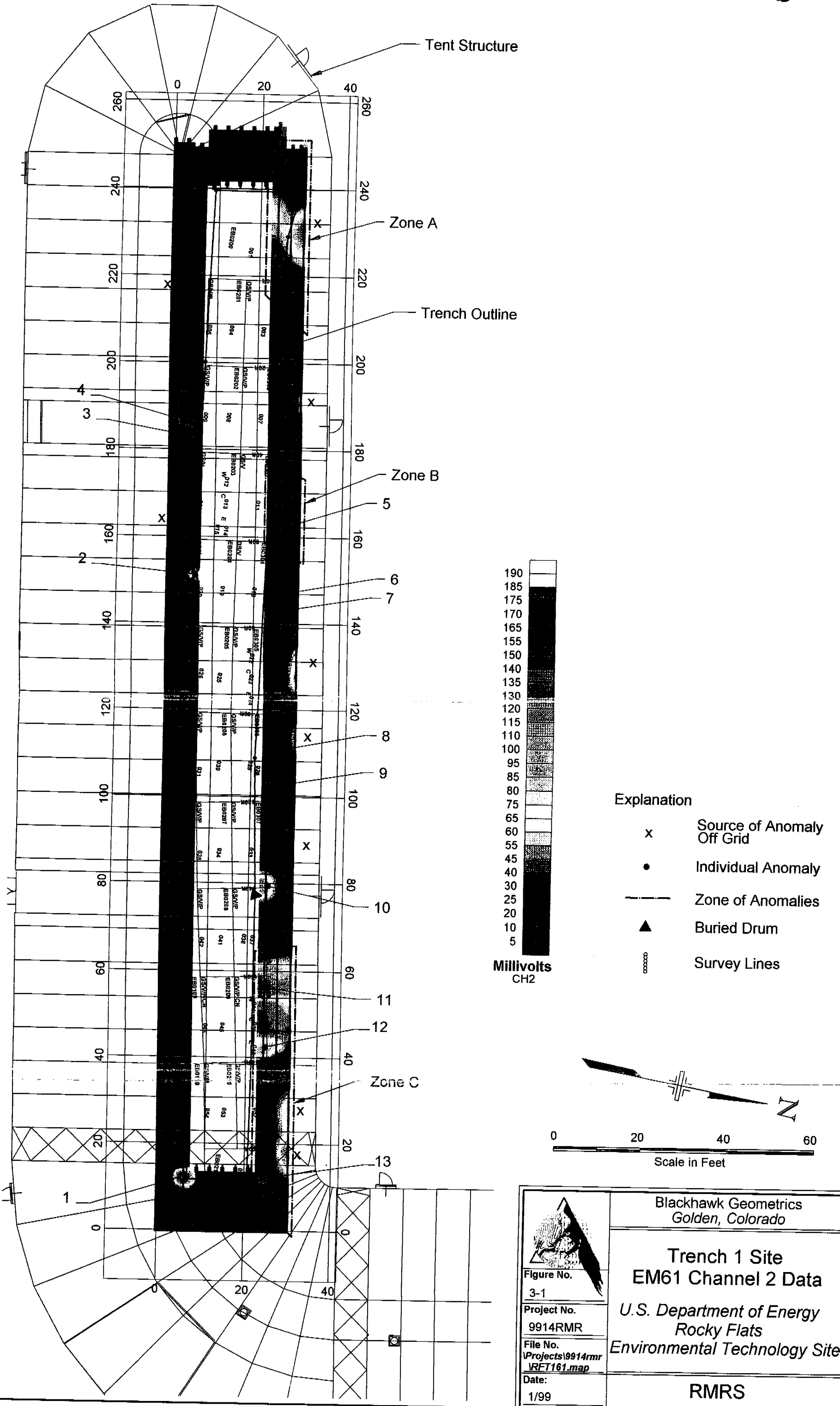
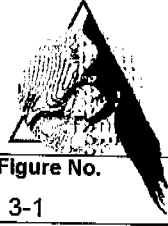


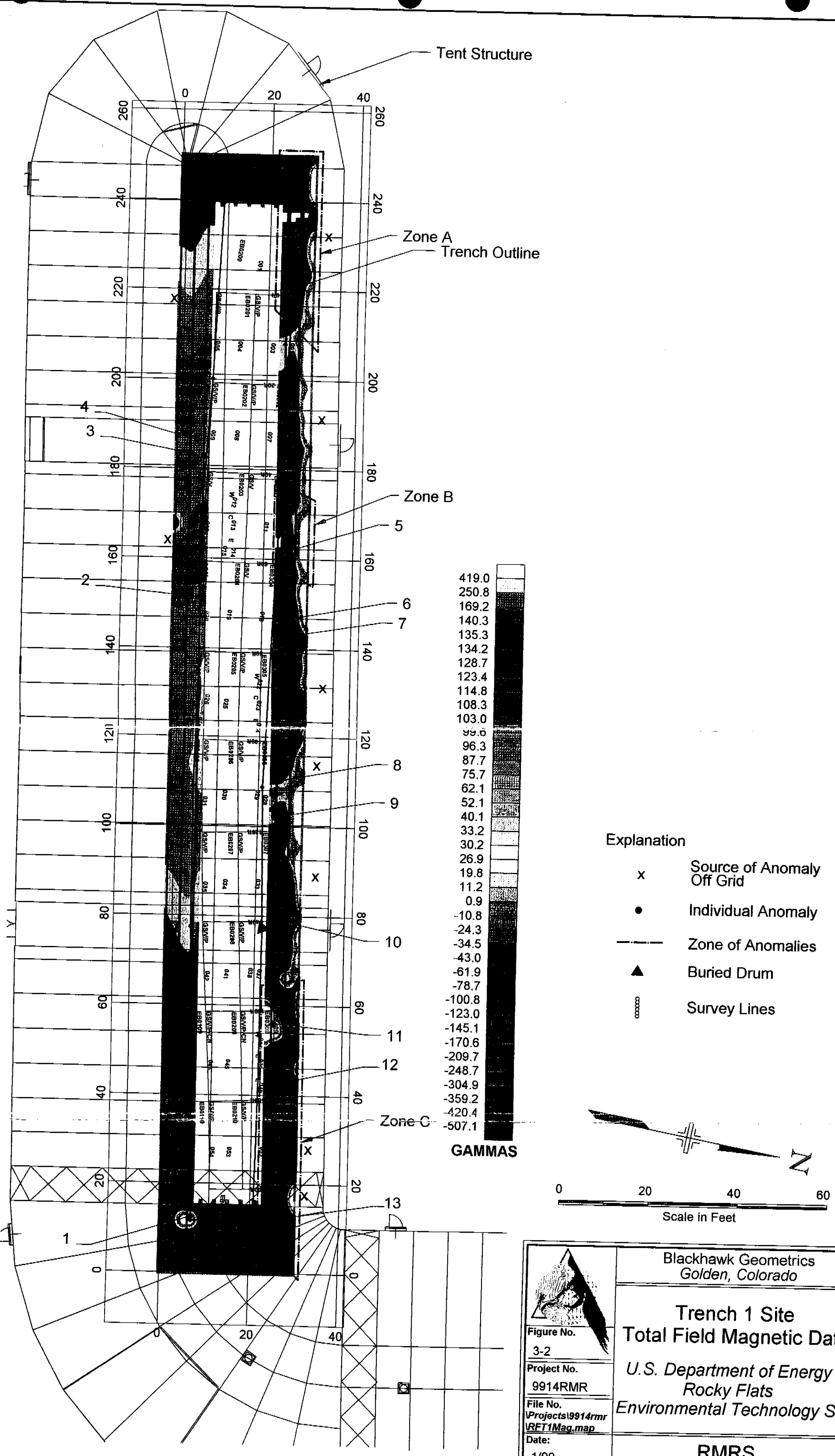
Figure 2.


SCHEMATIC LAYOUT OF THE TEMPORARY STRUCTURE AND THE LOCATIONS OF THE THREE SAMPLERS RELATIVE TO THE PROJECT ACTIVITIES



|   |   |                        |
|---|---|------------------------|
|  | Blackhawk Geometrics<br>Golden, Colorado                                  |                        |
|   | Trench 1 Site<br>EM61 Channel 2 Data                                      |                        |
|   | U.S. Department of Energy<br>Rocky Flats<br>Environmental Technology Site |                        |
|   | RMRS  |                        |
|   | Figure No.<br>3-1   | Project No.<br>9914RMR |
| File No.<br>Projects\9914rmr<br>VRF161.map  | Date:<br>1/99   |                        |





|   |   |
|---|---|
|  | Blackhawk Geometrics<br>Golden, Colorado                                  |
|   | <b>Trench 1 Site</b><br><b>Total Field Magnetic Data</b>                  |
|   | U.S. Department of Energy<br>Rocky Flats<br>Environmental Technology Site |
|   | <b>RMRS</b>   |

|   |
|---|
| Figure No.<br>3-2                           |
| Project No.<br>9914RMR                      |
| File No.<br>Projects\9914rmr<br>RFT1Mag.map |
| Date:<br>1/99                               |